



# **FY 2009 Office of Head Start Monitoring Protocol**

October 23, 2008



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## Introduction to the FY2009 Office of Health Start Monitoring Protocol

The Office of Head Start (OHS) presents the FY2009 Office of Head Start Monitoring Protocol. The Protocol has been revised for FY2009 to incorporate requirements of the 2007 Head Start Reauthorization Act and to place a greater emphasis on the quality of the delivery and management of program services. The Protocol organizes elements of program performance standards and other program regulations into 11 sections against which compliance will be monitored:

- Health Services
- Nutritional Services
- Safe Environments
- Transportation Services
- Disabilities Services
- Mental Health Services
- Family and Community Services
- Education and Early Childhood Development Services (ECD)
- Fiscal Management
- Program Design and Management
- Eligibility, Recruitment, Selection, Enrollment and Attendance (ERSEA)

*Compliance Questions* form the basis of the Protocol, with each question focusing on one or more program requirements against which compliance will be monitored. *Targeted Questions* facilitate the monitoring process for each Compliance Question. Review teams must respond to Compliance Questions using the prompts, which outline the minimum “evidence gathering” requirements in addressing questions effectively. The *Targeted Questions* indicate the people to interview, questions to ask, information to retrieve from documents, and observations to make in developing an understanding of grantee compliance with each question. All of the evidence gathering questions must be completed in order to answer the associated compliance question.

A series of tools have been developed to organize the evidence gathering process. These tools, which organize the Targeted Questions by method of data collection and source, include:

- Interview Guides
- Observation Guides
- Document Review Guides
- Checklists (e.g., ECD Observation Checklist)

The evidence collected through each tool is linked to Compliance Questions and will be used to assist review teams in making compliance determinations.

The Protocol gives grantees an opportunity to demonstrate compliance. Before the onsite monitoring review, grantees will be asked to identify the individual(s) who can address the Compliance and Targeted Questions most accurately and comprehensively. Grantee identification of the most appropriate individuals with whom review team members should communicate ensures that the onsite review provides an accurate assessment of the grantee’s program(s).



## Health Services

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Health Services section of the Protocol is divided into five subsections:

*Section 1: Human Resources*

*Section 2: Providing Health Services*

*Section 3: Health Policies and Procedures*

*Section 4: Early Head Start Programs Serving Pregnant Women or New Mothers*

*Section 5: Ongoing Monitoring*

**Health Services Question 1A**

Do the content area experts assigned to oversee health services have training and experience in public health, nursing, health education, maternal and child health, or health administration? Does the program assure that health procedures are performed only by a licensed or certified health professional?

1304.52(d)(2)  
Link: PDM7B

**Targeted Questions for Health Services Question 1A****Document Review: Staff Files**

- Before conducting your interviews, review the job description for the content area expert who oversees health services. Describe the required license or certification for health professionals with experience and expertise in serving young children and their families.
- Review the personnel file, contract, or resume of the health content area expert to determine whether he or she has documentation of a license or certification, as well as experience serving young children and their families. List the degree or degrees, training, experience and qualifications documented. Note the accrediting body for the license or certification.

**Interview: Health Staff (Staffing)**

- Describe how hired staff or consultants provide regularly scheduled and ongoing content area expertise and oversight.
- Does the program administer health procedures? If so, are procedures performed by licensed and certified professionals?
- What training or experience do you have in public health, nursing, health education, maternal and child health, or health administration?

**Health Services Question 2A**

Has the program established procedures for tracking, documenting, and reporting health care services?

1304.20(a)(1)(ii)(C),  
1304.20(d), 1304.22(a)(4),  
1304.20(e)(1), 1306.35(c)  
Link: PDM6A

**Targeted Questions for Health Services Question 2A****Document Review: Child Files**

- Review child files for completion of all screenings within 45 days (30 days for Migrant and Seasonal programs) and follow-up to identified concerns. 1304.20(b)(1), 1304.20(a)(2)
- Review child files for documentation (e.g., case notes, family contact logs) of the program's attempts to help parents bring their child up-to-date. Describe how the program works with parents to bring their child up-to-date on a schedule of primary preventive health care.

**Document Review: Health Tracking System**

- Review the program's health tracking system and identify a sample of children from the tracking system for record review. Have the grantee staff guide you through the actual records of the selected children, and compare them to the tracking system for accuracy. Have the grantee print a tracking system report for you to compare them to information in child files.

**Interview: Family Child Care Provider, Health Staff, Parent (Policies and Procedures)**

- How are parents notified in the event of an emergency involving their child? 1304.22(a)(4)
- What is the system for notifying parents of emergencies or unplanned interruptions in service? Describe the contingency plans you have developed with parents for these emergencies (e.g., alternative providers or substitutes)? How do you inform parents of an emergency or the need to pick up a child who has become ill? 1306.35(c)

**Interview: Health Staff (Providing Health Services)**

- What is your ongoing procedure for identifying new or recurring medical, dental, or developmental concerns? When noted or observed by staff or parents, how do you record physical changes in a child's appearance or signs of illness or injury? How often do you make referrals based on these observations? 1304.20(d)
- What is your system for tracking children's health care? How do you keep the system effective and accurate? How do you use the system to communicate child health needs with parents and staff? Can you show me your program's health tracking system? 1304.20(a)(1)(ii)(C)

**Interview: Health Staff, Parent (Policies and Procedures)**

- How do consultations with parents occur when health problems are suspected or identified for children? 1304.20(e)(1)



#### Health Services Question 2B

Does the program employ a process to determine whether each child has an ongoing source of continuous, accessible health care?

Note: 1304.20(a)(2) applies only to Migrant and Seasonal programs and should be cited in conjunction with 1304.20(a)(1)(i) for such programs.

1304.20(a)(1)(i),  
1304.20(a)(2)

#### Targeted Questions for Health Services Question 2B

##### Document Review: Child Files

- Review child files to determine whether children's ongoing source of health care is addressed during enrollment activities, before their entry into the program, or within 90 days of entry into the program (30 days for Migrant and Seasonal programs). Is the source of ongoing health care documented in the child's record?

##### Document Review: Policies and Procedures

- Review the program's procedure on determining children's access to ongoing healthcare. Does the program maintain a list of provider offices?

##### Interview: Health Staff (Providing Health Services)

- How do you determine whether enrolled children have an ongoing source of continuous, accessible health care within 90 days of entry?

##### Interview: Health Staff, Parent (Providing Health Services)

- How do you determine whether enrolled children have an ongoing source of continuous, accessible health care with in 30 days of entry?
- How does the program support you to ensure that your child has access to health care (e.g., your child has a primary care physician and dentist)?

**Health Services Question 2C**

Has the program obtained from a health care professional a determination of whether each child is up-to-date on a schedule of primary and preventive health care, helped parents bring children up-to-date when necessary, and kept children up-to-date, as required?

Notes: 1304.20(a)(2) applies only to Migrant and Seasonal programs and should be cited in conjunction with 1304.20(a)(1)(ii) for such programs.

The program is required to know which children are not current on the required primary and preventive health care, help parents bring their children up-to-date, and have a system to ensure that children who are current stay current.

1304.20(a)(1)(i),  
1304.20(a)(1)(ii),  
1304.20(a)(1)(ii)(A),  
1304.20(a)(1)(ii)(B),  
1304.20(a)(2)

**Targeted Questions for Health Services Question 2C****Document Review: Child Files**

- Review child files for documentation (e.g., case notes, family contact logs) of the program's attempts to help parents bring their child up-to-date. Describe how the program works with parents to bring their child up-to-date on a schedule of primary preventive health care.
- Review child files for up-to-date determinations that incorporate the requirements of the Early Periodic Screening, Diagnosis, and Treatment (EPSDT) schedule for each child and check dates of determinations to ensure the 90-day requirement (30 days for Migrant and Seasonal programs) is met. Does documentation include a breakout of blood lead and hemoglobin/hematocrit? 1304.20(a)(1)(ii), 1304.20(a)(2)

**Interview: Health Staff (Providing Health Services)**

- How do you ensure that children who are up-to-date with primary and preventive health care stay up-to-date? 1304.20(a)(1)(ii)(B)
- How do you obtain a determination of each child's health status from a health care professional and ensure that each child is up-to-date with the EPSDT requirements of your State, within 90 days of his or her entry into the program (30 days for Migrant and Seasonal programs)? 1304.20(a)(1)(ii), 1304.20(a)(2)
- If a child is not up-to-date on her or his schedule of primary and preventive health care, how do you help the parents bring their child up-to-date? Do you have documentation of your attempts to help parents bring their child up-to-date? 1304.20(a)(1)(ii)(A)
- What are the State EPSDT requirements for well child care?
- What do you do if parents are having difficulty making appointments or keeping their children up-to-date in primary and preventive health care?

**Interview: Parent (Providing Health Services)**

- Has the program helped you keep your child up-to-date on primary and preventive health care? Has the program helped you make and keep appointments? Has the program helped you understand the importance of staying up-to-date?



**Health Services Question 2D**

Has the program, in collaboration with each child's parent, performed or obtained the required linguistically and age-appropriate screening procedures to identify concerns regarding children within 45 days of entry into the program, obtained guidance on how to use screening findings, and used multiple sources of information to make appropriate referrals?

Note: 1304.20(a)(2) applies only to Migrant and Seasonal programs and should be cited in conjunction with 1304.20(b) for such programs.

1304.20(b)(1), 1304.20(b)(2),  
1304.20(b)(3), 1304.20(a)(2)

**Targeted Questions for Health Services Question 2D****Document Review: Child Files**

- Review child files for completion of all screenings within 45 days (30 days for Migrant and Seasonal programs) and follow-up to identified concerns. 1304.20(b)(1), 1304.20(a)(2)
- Use the health tracking system to identify files of children whose parents have refused to give authorization for health services. Sample the files of these children. Check for written documentation of their refusal. 1304.20(e)(5)

**Interview: Health Staff (Providing Health Services)**

- Do you obtain guidance from the mental health or child development specialist on how to use screening findings? How do you receive information? How do you use this information? 1304.20(b)(2)
- How and when do you ensure each child receives the following screenings: developmental, sensory (hearing and vision), behavioral, motor (gross and fine), language, social, cognitive, perceptual, and emotional skills? How do you ensure that the screenings are sensitive to the child's cultural background? 1304.20(b)(1)
- What other sources of information do you use to help you understand screening findings (e.g., parent, teacher, and other staff feedback)? How do you use this information to make referrals? 1304.20(b)(3)

**Health Services Question 2E**

Does the program ensure that each child with a known or suspected health, dental, or developmental problem receives further testing, examination, and treatment from a licensed or certified health care professional? Does the program ensure that appropriate follow-up actions are taken?

1304.20(a)(1)(iii),  
1304.20(a)(1)(iv),  
1304.20(c)(3)(ii),  
1304.20(c)(1), 1304.20(c)(2)  
Link: PDM6A

**Targeted Questions for Health Services Question 2E****Document Review: Child Files**

- Use the health tracking system to identify children with known or suspected health or developmental problems. Check the files of these children to determine whether further testing, examination, or treatment was obtained. Check whether a follow-up plan is in place and implemented, if appropriate.

**Interview: Health Staff (Policies and Procedures)**

- How do you communicate with parents to ensure implementation of medical and dental follow-up plans? 1304.20(c)(1), 1304.20(c)(2)
- How do you ensure that children receive preventive measures and further dental treatment recommended by dental professionals? 1304.20(c)(3)(ii)
- What is the process for obtaining further testing, examinations, or treatment for children with known or suspected health or developmental problems? How long does it take to receive care after problems are identified? 1304.20(a)(1)(iii)
- What is your process for implementing follow-up for children who have identified conditions and need additional care? How do you track and document this follow-up? 1304.20(a)(1)(iv)



#### Health Services Question 2F

Does the program maintain written documentation of instances when parents or other legally responsible adults refuse to give authorization for health services?

1304.20(e)(5)  
Link: PDM6A

#### Targeted Questions for Health Services Question 2F

##### Document Review: Child Files

- Use the health tracking system to identify files of children whose parents have refused to give authorization for health services. Sample the files of these children. Check for written documentation of their refusal. [1304.20\(e\)\(5\)](#)

##### Document Review: Health Tracking System

- Review the program's health tracking system and identify a sample of children from the tracking system for record review. Have the grantee staff guide you through the actual records of the selected children, and compare them to the tracking system for accuracy. Have the grantee print a tracking system report for you to compare them to information in child files.

##### Interview: Health Staff (Providing Health Services)

- What happens when a parent or guardian refuses health services? Have any parents or legally responsible adults with children currently enrolled refused to give authorization for health services?



### Health Services Question 3A

Does the program ensure that a child with a short-term injury (that cannot be readily accommodated) or short-term contagious illness is temporarily excluded from participating in program activities or group experiences while risk to the health or safety of that child or others is present?

1304.22(b)(1)

### Targeted Questions for Health Services Question 3A

#### Document Review: Policies and Procedures

- What are the program policies and procedures for handling short-term injuries (that can not be readily accommodated) or short-term contagious illnesses?

#### Interview: Health Staff (Policies and Procedures)

- Can you describe a situation when an outbreak of contagious illness has occurred in your program? What steps did you take to protect the health of all children?
- How does the program determine whether a child with a short-term injury or illness can be accommodated or should be temporarily excluded from the program? How are parents informed of the policies or procedures?



### Health Services Question 3B

Does the program ensure that children are not denied admission (or if already enrolled, they are not subjected to long-term exclusion) solely because of their health care needs or medication requirements, unless reasonable accommodations cannot be made to reduce the health or safety risk to that child or others without altering the nature of the program fundamentally?

1304.22(b)(2)

### Targeted Questions for Health Services Question 3B

#### Interview: Health Staff (Children with Special Health Needs)

- Are children ever denied admission to (or terminated from) the program for health reasons that could not be accommodated? If so, what was the basis for denying admission?



### Health Services Question 3C

Does the program ask parents about their children's health or safety needs and ensure that appropriate staff are informed of needed accommodations, in accordance with the program's confidentiality policy?

1304.22(b)(3)  
Links: DIS2B, PDM5B, PDM5A

### Targeted Questions for Health Services Question 3C

#### Document Review: Child Files

- Review child files to verify that they contain notes about children's health or safety needs and that staff are informed of accommodations that must be made for the children.

#### Interview: Health Staff (Children with Special Health Needs)

- Describe the procedure for requesting information from parents about their children's health or safety needs.
- How do you ensure that staff members who work directly with children are informed of needed accommodations?
- What is the policy for ensuring that information collected from parents about their children's health or safety needs is kept confidential?

### Health Services Question 3D

Are written procedures established and maintained to ensure proper administration, handling, and storage of all medications for children, staff, and volunteers?

1304.22(c), 1304.22(c)(1),  
1304.22(c)(2), 1304.22(c)(3),  
1304.22(c)(4), 1304.22(c)(5),  
1304.22(c)(6)

### Targeted Questions for Health Services Question 3D

#### Document Review: Child Files

- Review specific records of children on medication to determine whether all required conditions have been met. Do records include physicians' instructions and parent or guardian authorizations?

#### Document Review: Policies and Procedures

- Review the written policies and procedures related to administering medications. Verify information obtained in your interview with Health Staff. Are policies established and maintained to ensure proper administration, handling, and storage of all medications for children, staff and volunteers?

#### Interview: Health Staff (Policies and Procedures)

- Are all child medications labeled and stored, under lock and key, and refrigerated, if necessary? Is emergency medication (e.g., EpiPen) stored out of children's reach yet accessible quickly? 1304.22(c)(1)
- Describe how individual records are maintained for all medications dispensed. Are these records reviewed regularly with parents? 1304.22(c)(4)
- Describe how physician instructions and parent or guardian authorizations for medications are obtained. 1304.22(c)(3)
- Describe the steps needed to ensure that changes in a child's behavior are identified and documented and that parents are encouraged to communicate those issues with their physician. 1304.22(c)(5)
- What training did you receive for administering, handling, and storing medication, including use of equipment necessary to administer medication? 1304.22(c)(6)
- Who is the person designated and trained to administer, handle, and store child medications? How do you ensure that you are adhering to all applicable policies and procedures regarding the handling, administration, and storage of medication? 1304.22(c)(2)

**Health Services Question 4A**

APPLIES ONLY TO: Programs serving pregnant women or new mothers

Does the Early Head Start (EHS) program help pregnant women, immediately after enrollment in the program, access through referrals early and regular comprehensive prenatal and postnatal care that includes early and continuing risk assessment, health promotion and treatment, and mental health interventions and follow-up?

Note: Indicate in your notes whether no pregnant women are enrolled in the program currently. All programs funded to serve pregnant women should be monitored against this question. Look and listen for policies and procedures for serving pregnant women.

1304.40(c)(1),  
1304.40(c)(1)(i),  
1304.40(c)(1)(ii),  
1304.40(c)(1)(iii)

**Targeted Questions for Health Services Question 4A****Document Review: Pregnant Women Files**

- Review files of pregnant women (and health tracking system, if available) to check their enrollment dates and determine whether services (or referrals) were provided immediately.

**Interview: Health Staff (Pre/Post Natal Care Services)**

- Describe the referral agencies and partners you have identified to provide early and regular comprehensive prenatal and postnatal care.
- Do you provide mental health interventions and follow-up for enrolled pregnant women, when needed? Do these services include substance abuse prevention and treatment? 1304.40(c)(1)(iii)
- How and when after pregnant women are enrolled do you begin helping them access the following services: 1304.40(c)(1)(i)
  - Early and continuing risk assessment;
  - Health promotion and treatment;
  - Mental health interventions, and follow-ups; and
  - Nutritional assessment, counseling and food assistance, if needed?
- How and when do you obtain the schedule of appropriate medical and dental examinations for enrolled pregnant women from their attending health care providers? 1304.40(c)(1)(ii)

**Interview: Parent (Pre/Post Natal Care Services)**

- Ask mothers who have given birth within the program year: Did the program help you receive early and regular comprehensive prenatal and postnatal care that included early and continuing risk assessment, health promotion and treatment, and mental health interventions and follow-up?





#### Health Services Question 4B

APPLIES ONLY TO: Programs serving women who have delivered a baby within the last year

Do program health staff visit each newborn within 2 weeks of birth to ensure both the mother and child's wellbeing?

1304.40(i)(6)

#### Targeted Questions for Health Services Question 4B

##### Document Review: Pregnant Women Files

- Review the health tracking system or records of women who have delivered a baby within the last year for information on visits to newborns. Reviewer notes should indicate:
  - Whether visits are occurring;
  - Number of visits that occurred within 2 weeks of birth;
  - Number of visits that occurred beyond 2 weeks; and
  - How far beyond 2 weeks those visits occurred?
- If so, who conducts the visit?

##### Interview: Home Visitor (Pre/Post Natal Care Services)

- How do you ensure that visits are made to new mothers? Can you demonstrate that the visits have been made? How soon after birth are visits made?

##### Interview: Parent (Pre/Post Natal Care Services)

- Ask mothers of newborns: Did you receive a visit within 2 weeks of birth? If so, what did this visit cover?



#### Health Services Question 4C

APPLIES ONLY TO: Programs serving pregnant women or new mothers

Does the program provide pregnant women and other family members with prenatal and postnatal education on:

- Fetal development, labor and delivery, and postpartum recovery;
- Risks from smoking and alcohol;
- Maternal depression; and
- Breastfeeding benefits?

1304.40(c)(2), 1304.40(c)(3)  
Link: PDM5B

#### Targeted Questions for Health Services Question 4C

##### Document Review: Prenatal Education Materials

- Review prenatal education materials to determine whether they include information about breastfeeding benefits. [1304.40\(c\)\(3\)](#)
- Review prenatal education materials to determine whether they include information about: [1304.40\(c\)\(2\)](#)
  - Fetal development, labor and delivery, and postpartum recovery;
  - Risks from smoking and alcohol; and
  - Maternal depression.

##### Interview: Health Staff (Prenatal Education)

- Can you describe the prenatal and postnatal education you provide to pregnant women, new mothers, and their families?

##### Interview: Parent (Prenatal Education)

- Ask pregnant women or new mothers: What prenatal education did the program provide you?



#### Health Services Question 5A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of health services at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Health Services Question 5A

##### Document Review: Ongoing Monitoring Documents and Tools

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its health services as described through your interviews with health staff.

##### Interview: Health Staff (Ongoing Monitoring)

- How do you monitor delivery of the program's health services and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's health services? What is the process for reporting and documenting problems identified in the health service area? Who reports such information and to whom is it reported? How and where is it documented, if at all?



## Nutrition Services

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Nutrition Services section of the Protocol is divided into five subsections:

*Section 1: Human Resources*

*Section 2: Understanding Children's Nutritional Needs*

*Section 3: Managing Nutritional Services*

*Section 4: Integrating Nutrition into Early Childhood Development*

*Section 5: Ongoing Monitoring*



#### Nutrition Services Question 1A

Are content area experts assigned to oversee nutrition services registered dietitians or nutritionists?

1304.52(d)(3)  
Link: PDM7B

#### Targeted Questions for Nutrition Services Question 1A

##### Document Review: Staff Files

- Before conducting your interviews, review the job description for the content area expert who oversees nutrition services. Does the description require staff to be a registered dietitian or nutritionist?
- Review the personnel file, contract, or resume of the nutrition content area expert for documentation confirming he or she is a registered dietitian or nutritionist. List the degree or degrees, training, experience, and qualifications documented.

##### Interview: Nutrition Staff (Staffing)

- Describe how hired staff or consultants provide regularly scheduled and ongoing basis content area expertise and oversight.
- What training or experience do you have in securing and individualizing needed services for children with disabilities?

**Nutrition Services Question 2A**

Does the program's nutrition program include a variety of foods and meet each child's nutritional needs and feeding requirements, including children with disabilities and children with special medical or dietary needs?

1304.23(b)(1)  
Link: PDM5A

**Targeted Questions for Nutrition Services Question 2A****Document Review: Child Files**

- In your review of child files, note dietary requirements for children with disabilities, food allergies, or medically based or other special dietary needs. Consider nutritional assessment data. Determine whether the program makes the required accommodations to meet these children's dietary needs.

**Interview: Kitchen Staff, Kitchen Staff, Nutrition Staff (Nutritional Needs)**

- How do you know when you need to modify a menu for a child with disabilities, food allergies, or other medically based or special dietary needs? How do you take nutritional assessment data into consideration? How do you accommodate special medical or dietary needs?

**Interview: Nutrition Staff (Nutritional Needs)**

- How do you inform teaching and cooking staff that a child has a disability, food allergy, medically-based dietary need, or other special dietary need that requires accommodation?

**Observation: Meals**

- Describe the foods served to children.

**Nutrition Services Question 2B**

APPLIES ONLY TO: Center-based programs serving preschool-age children

Do 3- to 5-year-olds in center-based settings receive the quantities and kinds of foods that conform to recommended serving sizes and minimum standards for meal patterns recommended in the USDA meal pattern or nutrient standard menu planning requirements outlined in 7 CFR parts 210, 220, and 226, including special attention to ensuring that foods served are high in nutrients and low in fat, sugar, and salt?

Note: Refer to 7 CFR Parts 210, 220 (School Meal Initiatives for Healthy Children), and 226 (CACFP) for specific meal pattern and menu planning requirements.

1304.23(b)(1)(v),  
1304.23(b)(1)(vi),  
1304.23(b)(1)(ii)

**Targeted Questions for Nutrition Services Question 2B****Document Review: Menus**

- Review menus to identify whether menu planning complies with USDA requirements.

Note: If foods are high in fat, sugar, or salt, describe how you know their nutritional content.

**Interview: Nutrition Staff (Nutritional Needs)**

- For full-day center-based programs, how do you ensure that each child receives meals that provide one-half to two-thirds (depending on the length of the program day) of the child's daily nutritional needs? 1304.23(b)(1)(ii)
- For part-day center-based program, how do you ensure that each child receives meals and snacks that provide at least one-third of the child's daily nutritional needs? 1304.23(b)(1)(ii)



#### Nutrition Services Question 2C

APPLIES ONLY TO: Center-based programs

Are children in morning center-based settings served a nutritious breakfast if they have not received breakfast by the time they arrive at the Early Head Start (EHS) or Head Start (HS) program?

Note: A nutritious breakfast should be served to all center based children regardless of arrival time.

1304.23(b)(1)(iii)

#### Targeted Questions for Nutrition Services Question 2C

##### Interview: Teaching Staff (Nutrition)

➤ What happens when children arrive after breakfast is served?

##### Observation: Meals

➤ Are all children offered breakfast? If not, describe the circumstances when breakfast is not offered.





### Nutrition Services Question 2D

APPLIES ONLY TO: Programs serving infants and toddlers

Do program staff communicate regularly with parents to ensure that children's nutritional needs are met?

1304.23(a)(3)  
Link: PDM5B

### Targeted Questions for Nutrition Services Question 2D

#### Document Review: Child Files

- Review parent contact logs or daily child notes, if available, for documentation that staff communicate regularly with parents about their child's nutritional needs.

#### Interview: Home Visitor, Teaching Staff (Nutrition)

- How often do you communicate with parents about:
  - Frequency and manner of feeding;
  - Introduction of solid foods and other new foods;
  - Daily elimination patterns of each child;
  - Food intolerances and preferences of each child; and
  - Quantity and consumption of foods at home and school?

#### Interview: Parent (Nutrition)

- How does the program communicate with you about your child's daily experiences with food?



#### Nutrition Services Question 2E

APPLIES ONLY TO: Center-based programs serving infants and toddlers

Do infants and toddlers in center-based settings receive food appropriate to their nutritional needs, developmental readiness, and feeding skills, as recommended in the USDA meal pattern or nutrient standard menu planning requirements?

Note: Refer to 7 CFR Parts 210, 220 (School Meal Initiatives for Healthy Children), and 226 (Child and Adult Care Food Program [CACFP]) for specific meal pattern and menu planning requirements.

1304.23(b)(1)(iv)

#### Targeted Questions for Nutrition Services Question 2E

##### Document Review: Menus

- Review menus, diet intake records, or feeding records to confirm that foods posing health or choking risks are not included. Also, identify whether menu planning complies with USDA requirements.

Note: If foods are high in fat, sugar, or salt, describe how you know their nutritional content.

##### Interview: Nutrition Staff (Infant and Toddler-Appropriate Foods)

- How do you ensure that foods posing a high risk of choking for infants and toddlers (e.g., hot dogs, whole grapes, hard raw vegetables, popcorn, whole nuts) are not given to them?
- How do you ensure that foods posing health risks are not offered to children younger than 1 year old?



#### Nutrition Services Question 2F

Do program staff and families work together to identify each child's nutritional needs, including dietary requirements for children with disabilities, children with nutrition-related health problems, and for infants and toddlers?

1304.23(a)(2)  
Link: PDM5B

#### Targeted Questions for Nutrition Services Question 2F

##### Interview: Health Staff (Nutritional Needs)

- When and how often do you discuss children's nutritional needs with families? Can you provide documentation of activities such as meetings, communications, gatherings, interactions, agendas with sign-in sheets or similar documentation that demonstrates how communication with families occurs?

##### Interview: Nutrition Staff (Communication with Families)

- Do you discuss with families their cultural, religious, ethnic, or personal food preferences for their children? Do you discuss nutrition-related health problems, such as obesity, iron deficiency, failure-to-thrive, food allergies and intolerances, milk allergies, and lactose intolerance which require special dietary considerations?

##### Interview: Parent (Nutrition)

- When and how often do program staff discuss your children's nutritional needs and health with you?



**Nutrition Services Question 3A**

APPLIES ONLY TO: Home-based programs

Do home-based programs provide appropriate snacks and meals to each child during group socialization activities?

1304.23(b)(2)

**Targeted Questions for Nutrition Services Question 3A**

**Interview: Home Visitor (Nutrition)**

- How do you learn about a child's nutritional needs that require accommodation, including a disability, food allergy, medically based need, or other special dietary need?
- How do you work with parents to plan and implement nutrition activities for group socializations?

**Interview: Nutrition Staff (Infant and Toddler-Appropriate Foods)**

- How do you ensure that appropriate snacks and meals (e.g., formula, baby food) are provided to infants and toddlers during socialization?

**Interview: Parent (Nutrition)**

- Can you describe how you have been involved in planning nutrition activities for group socializations?

**Nutrition Services Question 4A**

Is effective dental hygiene promoted among children in conjunction with meals?

1304.23(b)(3)

**Targeted Questions for Nutrition Services Question 4A****Interview: Home Visitor, Teaching Staff (Dental Hygiene)**

- How often and when do children over age 1 year brush their teeth in school? (Note to reviewer: Once daily, after a meal, Head Start staff or volunteers should help children age 1 year or older brush their teeth using fluoride toothpaste.)
- How often and when do staff wipe the gums of infants' under age 1 year during the program day? (Note to reviewer: At least once during the program day, Head Start staff or volunteers must wash their hands then cover a finger with a gauze pad or soft cloth and gently wipe infants' gums.)

**Observation: Dental Hygiene**

- Describe toothbrushing and gum-wiping activities and when they occur.

**Nutrition Services Question 4B**

APPLIES ONLY TO: Center-based programs

Do nutrition services contribute to children's development and socialization by providing sufficient time for each child to eat? Does the program use food as punishment or reward? Is each child encouraged, but not forced, to eat or taste food?

1304.23(c)(2), 1304.23(c)(3)

**Targeted Questions for Nutrition Services Question 4B****Interview: Teaching Staff (Meal Service)**

- How do you encourage children to try new foods? Do children have to eat all of the foods offered? Are there times when children are not allowed to have something that is offered or are given something extra because of behavior?
- What steps do you take to ensure that children have adequate time to eat, and that slower eaters are given enough time to finish their food? 1304.23(c)(3)

**Observation: Meal Service**

- During meal service do children have adequate time to eat? Are slower eaters given enough time to finish their food? 1304.23(c)(3)

**Observation: Meal Service/Code of Conduct**

- How are children encouraged to try new foods? Do children have to eat all of the foods offered? Are there times when children are not allowed to have something that is offered or are given something extra because of behavior?



#### Nutrition Services Question 4C

APPLIES ONLY TO: Center-based programs

Do nutrition services contribute to children's development and socialization by ensuring that all toddlers, preschool children, and assigned classroom staff, including volunteers, eat together family-style, and share the same menu to the extent possible?

1304.23(c)(4)

#### Targeted Questions for Nutrition Services Question 4C

##### Observation: Meals

- Describe how staff implements family-style meals. For example:
  - Is conversation shared during the meal?
  - If the grantee serves prepackaged food, are teachers still sitting with the children during meals and snacks?
  - Do other designated staff or volunteers eat and converse with the children during meals if teachers are unable to have their meals at the same time as children?
  - Do teachers use mealtime as an opportunity to model language, conversation, and social interaction and to introduce nutritious foods?



#### Nutrition Services Question 4D

APPLIES ONLY TO: Center-based programs serving infants and toddlers

Do nutrition services contribute to children's development and socialization by ensuring that infants are held while being fed rather than being laid down to sleep with a bottle?

1304.23(c)(5)

#### Targeted Questions for Nutrition Services Question 4D

##### Observation: Bottle Feeding

➤ Are infants held during bottle feeding? If not, describe.





#### Nutrition Services Question 5A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of nutrition services at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Nutrition Services Question 5A

##### Document Review: Ongoing Monitoring Documents and Tools

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its nutrition services as described through your interviews with nutrition staff.

##### Interview: Nutrition Staff (Ongoing Monitoring)

- How do you monitor delivery of the program's nutrition services and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's nutrition services? What is the process for reporting and documenting problems identified in the nutrition service area? Who reports such information and to whom is it reported? How and where is it documented, if at all?



## Safe Environments

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Safe Environments section of the Protocol is divided into four subsections:

*Section 1: Facilities Materials and Equipment*

*Section 2: Hygiene*

*Section 3: Food Safety and Sanitation*

*Section 4: Ongoing Monitoring*



#### Safe Environments Question 1A

Do facilities used for center-based combination options, home-based group socialization activities, or family child care, comply with State and local licensing requirements?

1306.30(c), 1306.35(d)

#### Targeted Questions for Safe Environments Question 1A

##### Document Review: Facility License

- Does the family child care program have a license, if required by State, local, or Tribal regulations? Note that the license does not have to be posted for family child care programs. 1306.35(d)
- Is the facility license current? Where licensing standards are less stringent than Head Start Program Performance Standards, or where no State or local licensing standards exist, determine whether the grantee or delegate complies with all standards under 1304.53(a). 1306.30(c)

### Safe Environments Question 1B

Does the program ensure that each facility or family childcare home's space, light, ventilation, heat, and other physical arrangements are consistent with the health, safety, and developmental needs of children?

1304.22(a)(3), 1304.53(a)(10),  
1304.53(a)(10)(i),  
1304.53(a)(10)(iv),  
1304.53(a)(10)(v),  
1304.53(a)(10)(vi),  
1304.53(a)(10)(vii),  
1304.53(a)(10)(viii),  
1304.53(a)(10)(x),  
1304.53(a)(10)(xi),  
1304.53(a)(10)(xii),  
1304.53(a)(10)(xiv),  
1304.53(a)(10)(xvi)

### Targeted Questions for Safe Environments Question 1B

#### Checklist: Safe Environments Checklist

- Are approved fire extinguishers readily available to staff? 1304.53(a)(10)(v)
- Are areas used for diapering and toileting separate from areas used for cooking, eating, and children's activities? 1304.53(a)(10)(xiv)
- Are classrooms well lit? Is emergency lighting available in case of a power failure? 1304.53(a)(10)(iv)
- Are electrical outlets accessible to children covered or maintained to prevent shock? 1304.53(a)(10)(xi)
- Are emergency evacuation routes posted and safety procedures for emergencies (e.g., fire or weather-related) practiced regularly? 1304.22(a)(3)
- Are exits clearly visible and evacuation routes clearly marked and posted so the path to safety outside is unmistakable? (Note: This Head Start Program Performance Standard does not indicate exit signs must be posted and lit.) 1304.53(a)(10)(vii)
- Are garbage and trash stored and disposed of in a safe, sanitary manner? 1304.53(a)(10)(xvi)
- Are heating and cooling systems insulated to protect children and staff from injury such as burns? 1304.53(a)(10)(i)  
APPLIES ONLY TO: Programs in climates that require heating or cooling systems or both
- Are playground equipment and surfaces maintained to minimize injury to children? 1304.53(a)(10)(x)
- Are smoke detectors installed and tested regularly? 1304.53(a)(10)(vi)
- Are windows and glass doors constructed, adapted, or adjusted to prevent injury to children? Look for a seal on the safety glass. 1304.53(a)(10)(xii)

- Does the program ensure that indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions?

Describe exactly what was unclean and not kept free of undesirable and hazardous materials and conditions, including in how many classrooms and sites this incident occurred out of the total number of classrooms and sites observed. 1304.53(a)(10)(viii)

# Targeted Questions for Safe Environments Question 1B

## Checklist: Safe Environments Checklist (Family Child Care)

- Are children enrolled in the family child care program protected from potential hazards posed by appliances? Are premises free from pests? Are chemicals for controlling pests not used while children on the premises?  
Describe exactly what was unclean and not kept free of undesirable and hazardous materials and conditions, including what might pose a potential hazard. [1306.35\(b\)\(2\)\(i\)](#)
- Are radon detectors installed in family child care homes where there is a basement, where recommended by local health officials? [1306.35\(b\)\(2\)\(iii\)](#)
- Are smoke and carbon monoxide detectors installed and properly located? [1306.35\(b\)\(2\)\(ii\)](#)
- Do providers ensure that alcohol and drugs are not consumed while children are present? Do providers ensure that alcohol and drugs are inaccessible to children at all times? [1306.35\(b\)\(2\)\(viii\)](#)
- Do providers ensure that no firearms or other weapons are kept in areas occupied by children? Do providers ensure that firearms or other weapons are inaccessible to children at all times? [1306.35\(b\)\(2\)\(vii\)](#)
- Do providers ensure the safety of children when a body of water, road, or other potential hazard is present or when children are being transported? [1306.35\(b\)\(2\)\(v\)](#)
- Do providers have a system of supervision in place that assures safety of children not within view for any period (e.g., the provider needs to use the bathroom or an infant is napping in one room while toddlers play in another)? [1306.35\(b\)\(2\)\(iv\)](#)
- Do providers secure health certificates for pets to document up-to-date immunizations and freedom from conditions that pose a threat to children's health? Do providers ensure that pets are managed appropriately to ensure children's safety at all times? [1306.35\(b\)\(2\)\(ix\)](#)
- Is there a fence to prevent unsupervised access by children to all water hazards, such as pools or other bodies of water? Small child-size pools do not need a fence but must be supervised at all times. [1306.35\(b\)\(2\)\(vi\)](#)

## Document Review: Facility Cleaning Log

- Describe how the program logs its daily cleaning of the indoor and outdoor premises. [1304.53\(a\)\(10\)\(viii\)](#)

## Document Review: Policies and Procedures

- Record the date of the last smoke detector check. [1304.53\(a\)\(10\)\(vi\)](#)

## Interview: Facilities Staff (Facilities, Materials, and Equipment)

- Describe the system in place to monitor daily cleaning of the indoor and outdoor premises. [1304.53\(a\)\(10\)\(viii\)](#)



**Safe Environments Question 1C**

APPLIES ONLY TO: Programs serving infants and toddlers

Are mattresses used for infants firm, and is soft bedding, such as comforters, pillows, fluffy blankets, or stuffed toys avoided?

1304.53(b)(3)

**Targeted Questions for Safe Environments Question 1C**

**Observation: Bedding**

- Are mattresses used for infants firm? Is the sleeping area free of soft bedding such as comforters, pillows, fluffy blankets, or stuffed toys?



#### Safe Environments Question 1D

APPLIES ONLY TO: Programs serving infants and toddlers

Are all infant and toddler toys made of nontoxic materials and sanitized regularly?

1304.53(b)(2)

#### Targeted Questions for Safe Environments Question 1D

##### Interview: Facilities Staff, Teaching Staff (Facilities, Materials, and Equipment)

- How and when do you sanitize toys? What products do you use to sanitize toys? Can you show me the product? (Note: Check the product label to confirm that it is nontoxic.)

##### Observation: Toy Sanitation

- When are toys sanitized? Review toy sanitizing schedule, if available.



#### Safe Environments Question 1E

APPLIES ONLY TO: Center-based programs

Are there at least 35 square feet of usable indoor space and 75 square feet of usable outdoor space per child, excluding bathrooms, halls, kitchen, staff rooms, and storage space?

1304.53(a)(5)

#### Targeted Questions for Safe Environments Question 1E

##### Observation: Indoor Space

- If allowable space is in question, calculate square footage per child using the number of children enrolled in that classroom.  
If you are citing a problem for this question, indicate the number of children currently enrolled in the classroom and the measurement of the current classroom space.





#### Safe Environments Question 1F

APPLIES ONLY TO: Center-based programs

Are outdoor play areas at center-based programs arranged to prevent children from getting into both unsafe and unsupervised areas? Does the program ensure that children en route to play areas are not exposed to vehicular traffic without supervision?

Notes: Fences are not required. However, where fences, walls, or other barriers are present, they, themselves, must not pose a safety hazard. If they do pose a safety hazard, refer to Compliance Question SAF1H.

If you identify an issue related to vehicular traffic, indicate how children are at risk, specifically, how they are exposed to vehicular traffic when unsupervised.

1304.53(a)(9)

#### Targeted Questions for Safe Environments Question 1F

##### Interview: Teaching Staff (Outdoor Play Area)

- How are children supervised at all times while on the playground?
- How do you prevent children from getting into unsafe areas?

##### Interview: Teaching Staff (Vehicular Traffic)

- Are children exposed to vehicular traffic when en route to play? If so, how do you keep children safe?

##### Observation: Outdoor Play Area

- Observe outdoor play areas when children are present. Are children supervised on the playground at all times? How do staff work around any "blind spot" to ensure they can see all of the children?



#### Safe Environments Question 1G

Does the program ensure that the indoor and outdoor space in Early Head Start (EHS) or Head Start (HS) centers in use by mobile infants and toddlers is separated from general walkways and from areas in use by preschoolers?

1304.53(a)(4)

#### Targeted Questions for Safe Environments Question 1G

##### Observation: Indoor/Outdoor Space

- Are indoor and outdoor spaces in use by mobile infants and toddlers separated from general walkways and from areas in use by preschoolers?
- If space used by mobile infants, or toddlers is not separated from general walkways and areas used by preschoolers, describe it.



#### Safe Environments Question 1H

Does the program provide for maintenance, repair, safety, and security of all Head Start facilities and equipment?

1304.53(a)(7)  
Link: PDM3F

#### Targeted Questions for Safe Environments Question 1H

##### Interview: Facilities Staff (Budget)

- What is the budget allocation for ensuring that Head Start facilities and equipment are maintained, repaired, safe and secure?
- What is the system for addressing facilities and equipment that are unsafe or need repair?

##### Interview: Facilities Staff, Teaching Staff (Maintenance)

- Whom do you tell when facilities and equipment are unsafe or need repair?

##### Observation: Maintenance

- Observe the facilities and equipment, and describe anything that is unsafe or needs repair, if applicable.

**Safe Environments Question 11**

APPLIES ONLY TO: Center-based programs

Do the program's facilities provide adequately for children with disabilities to ensure their safety, comfort, and participation?

1304.53(a)(10)(xvii),  
1304.53(b)(1)(iii)**Targeted Questions for Safe Environments Question 11****Document Review: Budget**

- Does the budget allocate funds for the purchase and upkeep of equipment, toys, materials, and furniture that are age appropriate, safe, and supportive of children with disabilities?

**Interview: Disabilities Staff, ECD Manager (Adaptation for Children with Disabilities)**

- What steps are taken to ensure that all equipment, toys, materials, and furniture are age-appropriate, safe, and supportive of children with disabilities? 1304.53(b)(1)(iii)

**Observation: Indoor/Outdoor Space**

- Observe indoor and outdoor spaces, and describe how provisions are made for children with disabilities to ensure their safety, comfort, and participation. 1304.53(a)(10)(xvii)



#### Safe Environments Question 1J

APPLIES ONLY TO: Center-based programs

Does the program ensure that centers are free of toxins, air pollutants, and water contaminants?

1304.53(a)(8)

#### Targeted Questions for Safe Environments Question 1J

##### Document Review: Licensing or Inspection Report

- If available, review recent licensing reports or environmental inspection reports. What, if any, concerns were noted in the reports? Are issues in the process of being corrected?

##### Interview: Facilities Staff (Facilities, Materials, and Equipment)

- Has the center been tested for lead (e.g., paint, soil)? If so, were lead levels considered safe?  
If lead levels are high, what steps have been taken to eliminate children's exposure to lead while in the center?
- When was the last time the center was sprayed with herbicides or pesticides? When did children return to the center after spraying?

##### Observation: Environmental Conditions

- Does the program maintain a smoke-free environment on center grounds?

**Safe Environments Question 2A**

Do staff, volunteers, and children wash their hands with soap and running water?

Note: Refer to Safe Environments Compliance Question 3A with reference to any local requirement for hand-washing after food-related preparation or handling. If nothing is documented in the service plan, but staff do wash hands as required, then the program is in compliance.

1304.22(e)(1)(i),  
1304.22(e)(1)(ii),  
1304.22(e)(1)(iii),  
1304.22(e)(1)(iv),  
1304.22(e)(2)(i),  
1304.22(e)(2)(ii),  
1304.22(e)(2)(iii)

**Targeted Questions for Safe Environments Question 2A****Observation: Hand Washing**

- Do staff, volunteers, and children wash their hands with soap and running water after assisting a child with toilet use? 1304.22(e)(2)(iii)
- Do staff, volunteers, and children wash their hands with soap and running water after handling pets or other animals? 1304.22(e)(1)(iv)
- Do staff, volunteers, and children wash their hands with soap and running water after hands have become contaminated with blood or other bodily fluids? 1304.22(e)(1)(iii)
- Do staff, volunteers, and children wash their hands with soap and running water before and after bandaging a wound? 1304.22(e)(2)(ii)
- Do staff, volunteers, and children wash their hands with soap and running water before and after giving medications? 1304.22(e)(2)(i)
- Do staff, volunteers, and children wash their hands with soap and running water before food-related preparation or activities? 1304.22(e)(1)(ii)
- Do staff, volunteers, and children wash their hands with soap and running water, after diapering and toilet use? 1304.22(e)(1)(i)



#### Safe Environments Question 2B

Do staff and volunteers wear nonporous gloves when in contact with blood or other visibly bloody bodily fluids?

1304.22(e)(3)

#### Targeted Questions for Safe Environments Question 2B

##### Interview: Facilities Staff, Teaching Staff (Hygiene)

- Where are gloves kept? When do you use the gloves? Determine whether gloves are nonporous.

##### Observation: Cleanup of Bodily Fluids

- If you observe a situation requiring use of nonporous gloves (e.g., clean up of blood), describe whether nonporous gloves are available to staff, where the gloves are kept, and when staff determine they would use them.
- If you observe the cleanup of bodily fluids, describe how it was handled. 1304.22(e)(4)

**Safe Environments Question 2C**

Are spilled bodily fluids immediately cleaned up and disinfected according to professionally established guidelines? Are tools and equipment used to clean spills promptly disinfected? Are blood-contaminated materials disposed of in a plastic bag with a secure tie?

1304.22(e)(4)

**Targeted Questions for Safe Environments Question 2C****Document Review: Policies and Procedures**

- Review the program's policies for spilled bodily fluids. Do policies comply with Occupational Safety and Health Administration guidelines? 1304.22(e)(4)

**Interview: Facilities Staff (Hygiene)**

- What would you do if a spill of bodily fluids occurred? 1304.22(e)(4)

Include in your notes the names and titles of the people with whom you spoke, and identify the center name.

**Observation: Cleanup of Bodily Fluids**

- If you observe a situation requiring use of nonporous gloves (e.g., clean up of blood), describe whether nonporous gloves are available to staff, where the gloves are kept, and when staff determine they would use them.
- If you observe the cleanup of bodily fluids, describe how it was handled. 1304.22(e)(4)





#### Safe Environments Question 2D

Does the program adopt sanitation and hygiene practices for diapering that adequately protect children and staff's health and safety?

1304.22(e)(5)

#### Targeted Questions for Safe Environments Question 2D

##### Interview: Teaching Staff-EHS (Diapering Practices)

- What is the practice for changing children's diapers? 1304.22(e)(5)

##### Observation: Diapering Practices

- Describe diapering practices in detail, where the practices occurred, how many occasions you observed them, and who was involved. 1304.22(e)(5)



**Safe Environments Question 2E**

APPLIES ONLY TO: Center-based programs

Are potties used in center-based programs emptied into the toilet and cleaned and disinfected after each use in a utility sink for that purpose?

1304.22(e)(6)

**Targeted Questions for Safe Environments Question 2E**

**Observation: Cleanup of Bodily Fluids**

- Describe practices related to the use of potties, including where and on how many occasions you observed them, and who was involved. Also note the presence of a utility sink and if a utility sink was used. 1304.22(e)(6)

**Safe Environments Question 2F**

Does the program ensure that first aid kits are well supplied, age appropriate, and readily accessible to staff (but not children) at each facility and while offsite?

1304.22(f)(1), 1304.22(f)(2)

**Targeted Questions for Safe Environments Question 2F****Interview: Facilities Staff (First Aid Kits)**

- When are first aid kits restocked? When is the inventory of first aid kits conducted? 1304.22(f)(2)

**Observation: First Aid Kits**

- Look at the first aid kits and indicate whether: 1304.22(f)(1)
- Kits contain items within the expiration date, if applicable;
  - All staff working with children know where the kits are located;
  - Kits are kept out of children's reach; and
  - Program has a portable first aid kit for use on trips to offsite locations or on the playground.

**Observation: Vehicle Equipment**

- Does the vehicle used in providing transportation services have a well-stocked first aid kit? 1310.10(d)(3)

**Safe Environments Question 3A**

Does the program ensure that all applicable Federal, State, local, and Tribal food safety and sanitation laws are met and evidence of compliance, including appropriate licenses and certificates, is posted?

1304.23(e)(1),  
1304.53(a)(10)(xiii)

**Targeted Questions for Safe Environments Question 3A****Document Review: Facility License**

- Indicate whether the grantee and delegate have available all licenses and certificates that permit them to handle and serve food and whether such licenses and certifications are posted. 1304.23(e)(1)

**Interview: Facilities Staff (Facilities, Materials, and Equipment)**

- Is the water supply adequate and approved by the State or local health authority? Can you show me documentation of licensing inspection? Record the date of the most recent inspection. 1304.53(a)(10)(xiii)

**Interview: Nutrition Staff (Food Safety)**

- How do you ensure that food service vendors observe State, local, or Tribal safety and sanitation regulations related to food handling? 1304.23(e)(1)



**Safe Environments Question 3B**

APPLIES ONLY TO: Programs serving infants and toddlers

Does the program ensure that facilities are available for the proper refrigerated storage and handling of breast milk and formula?

1304.23(e)(2)

**Targeted Questions for Safe Environments Question 3B**

**Interview: Teaching Staff-EHS (Food Safety)**

- What precautions are taken to ensure each child receives his or her own mother's breast milk or the correct formula? How do staff and parents communicate to ensure containers of breast milk or formula are dated, clearly labeled with the child's name, and used only for the intended child?

**Safe Environments Question 4A**

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of facilities, materials, and equipment as well as child health and safety policies, plans, and procedures at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

**Targeted Questions for Safe Environments Question 4A****Document Review: Ongoing Monitoring Documents and Tools**

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its equipment and facilities as described through your interviews with the facilities manager and staff.

**Interview: Facilities Staff (Ongoing Monitoring)**

- How do you monitor the program's facilities, materials, and equipment and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's facilities, materials, and equipment? What is the process for reporting and documenting problems identified with the facilities, materials, and equipment? Who reports such information and to whom is it reported? How and where is it documented, if at all?
- What is the process for reporting and documenting problems identified with the program's facilities, materials, and equipment?  
Who reports such information and to whom is it reported? How and where is it documented, if at all?

**Interview: Facilities Staff, Head Start Director (Ongoing Monitoring)**

- Does the program review maintenance requests or reports of accidents and injuries to identify trends and make needed improvements?



## Transportation Services

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For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Transportation Services section of the Protocol is divided into five subsections:

- Section 1: Transportation Services Management*
- Section 2: Grantee and Delegate Directly Provided or Contract-Provided Transportation*
- Section 3: Bus Driver Credentials, Qualifications, and Training*
- Section 4: Transportation-Related Services*
- Section 5: Ongoing Monitoring*



#### Transportation Services Question 1A

Does the program ensure that vehicles used to provide transportation services are maintained in safe operating condition at all times?

1310.13(a), 1310.13(b),  
1310.13(c)

#### Targeted Questions for Transportation Services Question 1A

##### Document Review: State Vehicle Inspections

- Review the annual State inspection certificate of each vehicle provided by the State licensing agency, if applicable. 1310.13(a)

##### Interview: Transportation Staff (Vehicle Maintenance)

- Can you describe the preventive maintenance done for each vehicle? 1310.13(b)
- How often do you conduct a pre-trip inspection of the vehicle? What happens if something does not pass the pre-trip inspection? Describe how the inspection ensures that the vehicle is in safe operating condition. 1310.13(c)

##### Observation: Vehicle Maintenance

- Describe the bus driver's pre-trip inspection. If the bus driver completes a pre-trip inspection form, review a copy of the form.





#### Transportation Services Question 1B

APPLIES ONLY TO: Center-based programs

Do programs providing transportation services, either directly or through a contract, have an applicant review process that advises applicants for driving positions of the specific background checks required?

1310.16(b)  
Link: PDM7E

#### Targeted Questions for Transportation Services Question 1B

##### Document Review: Staff Files

- Confirm background checks for transportation staff and the transportation manager via the program's tracking system. Select staff files to verify the staff background check information provided in the tracking system. If a tracking system is unavailable, review staff files for each service area to determine whether appropriate criminal record checks are conducted before hire date.

For all staff, indicate the date the background check was conducted.

- Have the specific background checks required for all bus drivers been completed?

##### Interview: Head Start Director (Human Resources)

- How do you ensure the specific background checks are conducted for contracted drivers?

##### Interview: Transportation Manager (Human Resources)

- What is the program's process for background checks on their contracted bus drivers?

##### Interview: Transportation Staff (Human Resources)

- Was a background check conducted when you were hired?



#### Transportation Services Question 1C

APPLIES ONLY TO: Grantees in States that grant CDLs

Does each bus driver have a valid commercial driver's license (CDL)?

1310.16(a)(1)

#### Targeted Questions for Transportation Services Question 1C

##### Document Review: Staff Files

- Does each bus driver have a valid commercial driver's license (CDL)? Note the State issued and expiration date to verify validity.

**Transportation Services Question 2A**

Does the program ensure that each vehicle is properly equipped?

1310.10(d)(1), 1310.10(d)(2),  
1310.10(d)(3), 1310.10(d)(4),  
1310.12(b)(2), 1310.12(b)(1)**Targeted Questions for Transportation Services Question 2A****Observation: Vehicle Equipment**

- Are vehicles equipped with height- and weight-appropriate restraint systems? 1310.12(b)(1)
- Are vehicles equipped with reverse beepers? 1310.12(b)(2)
- Does the vehicle used in providing transportation services have a seat belt cutter? 1310.10(d)(4)
- Does the vehicle used in providing transportation services have a well-stocked first aid kit? 1310.10(d)(3)
- During the observation of the bus, locate the fire extinguisher and check the gauge to ensure that the device is fully charged. 1310.10(d)(2)
- Is the vehicle equipped with a two-way communication system to call for assistance? Is there a back-up plan if the two-way communication system is not working (e.g., in drop zones)? 1310.10(d)(1)



#### Transportation Services Question 2B

Are baggage and other items transported in the passenger compartment properly stored and secured, aisles cleared, and doors and emergency exits unobstructed at all times?

1310.15(b)

#### Targeted Questions for Transportation Services Question 2B

##### Observation: Transportation

- Observe whether baggage or other items are transported in the passenger compartment. If so, is the baggage or are the other items properly stored?

**Transportation Services Question 2C**

Does the program adhere to the basic principles of trip routing?

1310.20(b), 1310.20(b)(1),  
1310.20(b)(3), 1310.20(b)(5),  
1310.20(b)(6), 1310.20(b)(7)**Targeted Questions for Transportation Services Question 2C****Interview: Transportation Staff (Safety)**

- Describe procedures for using alternate routes in case of hazardous conditions. 1310.20(b)(7)
- Does the bus monitor or another adult escort children when they have to cross the street? 1310.20(b)(6)

**Observation: Safety**

- Are transit times for children 1 hour or less each way, unless a shorter route is unavailable, unsafe, or impractical? 1310.20(b)(1)
- Does the bus driver avoid backing up or making "U" turns beyond what is necessary for safety reasons or because of physical barriers? 1310.20(b)(3)
- Does the bus driver ensure stops are located to eliminate the need for children to cross the street or highway when boarding or exiting the vehicle? 1310.20(b)(5)



#### Transportation Services Question 2D

DOES NOT APPLY TO: Programs with a waiver approved by ACF for this requirement.

Are all vehicle occupants, except the bus monitors assisting children, seated in height- and weight-appropriate restraint systems while the vehicle is in motion?

Notes: An approval letter from the Administration for Children and Families (ACF) is required for an exception from this regulation.

Lap belts only are not acceptable for child restraints. The performance standard does not require bus monitors to wear restraints.

1310.15(a), 1310.15(d)

#### Targeted Questions for Transportation Services Question 2D

##### Observation: Transportation

- Are all vehicle occupants, except the bus monitors assisting children, seated in height- and weight-appropriate restraint systems while the vehicle is in motion?

(Note: Lap belts only are not acceptable for child restraints.)

**Transportation Services Question 2E**

Are children released only to a parent, legal guardian, or other individual as designated in writing by the parent or legal guardian? Does the agency maintain lists of the persons, including alternates in case of emergency, and up-to-date child rosters at all times to ensure that no child is left behind, either at the classroom or on the vehicle at the end of the route?

1310.10(g)

**Targeted Questions for Transportation Services Question 2E****Interview: Transportation Staff (Transportation)**

- How do you ensure that no child is left on the vehicle at the end of the route?
- What process do you follow if no parent is at a stop to meet a child exiting the bus?

**Interview: Transportation Staff, Transportation Manager (Transportation)**

- How does the bus driver receive up-to-date information on children, especially when a contractor provides transportation services?

**Observation: Transportation**

- Are children released only to a parent, legal guardian, or other individual as designated in writing by the parent or legal guardian? How does the bus driver know who these individuals are?



#### Transportation Services Question 2F

Does the program providing transportation services ensure that all accidents involving vehicles that transport children are reported in accordance with applicable State requirements?

1310.10(f)

#### Targeted Questions for Transportation Services Question 2F

##### Document Review: Driver Incident Reports

- Are accidents reported in accordance with applicable State requirements?

##### Interview: Transportation Staff (Safety)

- Have you ever been involved in an accident? If so, how was it reported?
- How are families notified if a child is onboard a bus when an accident occurs?





**Transportation Services Question 2G**

DOES NOT APPLY TO: Programs with a waiver approved by ACF for this requirement

Is at least one bus monitor onboard at all times?

Note: An approval letter from ACF is required for an exception from this regulation.

1310.15(c)(1)

**Targeted Questions for Transportation Services Question 2G**

**Interview: Transportation Staff (Transportation)**

- How are substitute monitors provided when the regular bus monitor is absent?

**Observation: Transportation**

- Is at least one bus monitor onboard at all times?



#### Transportation Services Question 2H

DOES NOT APPLY TO: Programs with a waiver approved by ACF for this requirement

Has each bus monitor, before duty, been trained on child boarding and exiting procedures, use of child restraint systems, required paperwork, emergency response and evacuation procedures, use of special equipment, child pickup and release procedures, and pre- and post-trip vehicle check?

Note: An approval letter from ACF is required for an exception from this regulation.

1310.17(f)(2)  
Link: PDM7I

#### Targeted Questions for Transportation Services Question 2H

##### Document Review: Training Procedures-Bus Monitors

- Does the program have training procedures for bus monitors?

##### Interview: Transportation Staff (Training)

- What training did you receive on child boarding and exiting procedures, use of child restraint systems, required paperwork, emergency and evacuation procedures, use of special equipment, child pickup and release procedures, and pre- and post-trip vehicle checks?

**Transportation Services Question 3A**

Does the program ensure that persons employed to drive vehicles receive the required behind-the-wheel and classroom training before transporting children and annually thereafter?

1310.17(b)(1), 1310.17(b)(2),  
1310.17(b)(3), 1310.17(b)(4),  
1310.17(b)(5), 1310.17(b)(6),  
1310.17(b)(7), 1310.17(d)  
Link: PDM7I

**Targeted Questions for Transportation Services Question 3A****Document Review: Staff Files**

- Review bus driver and bus monitor staff files for evidence of required training. Indicate the dates and types of training transportation staff have received.

**Document Review: Training Procedures-Bus Monitors**

- Describe the behind-the-wheel and classroom training procedures for bus drivers, noting how often bus drivers are required to participate in such training.

**Interview: Transportation Staff (Training)**

- Did you receive the following classroom and behind-the-wheel training on how to: 1310.17(b)
  - Operate the vehicle safely and efficiently;
  - Run a fixed route safely, including loading and unloading children, stopping at railroad crossings, and performing other specialized driving maneuvers;
  - Administer basic first aid in case of injury;
  - Handle emergency situations, including vehicle evacuations;
  - Operate special equipment, such as wheelchair lifts, assistance devices or special occupant restraints;
  - Conduct routine maintenance and safety checks on the vehicle;
  - Maintain accurate records; and determine what records are necessary?
- Do you receive refresher behind-the-wheel and classroom training courses annually? 1310.17(d)



### Transportation Services Question 3B

Do bus drivers receive annual evaluations, which must include an onboard observation of road performance?

1310.17(f)(1)  
Link: PDM7C

### Targeted Questions for Transportation Services Question 3B

#### Document Review: Staff Files

- Indicate the date of the bus driver's last performance evaluation and whether the annual review includes an onboard observation. If the onboard observation was conducted separately from the annual review, indicate the date of the onboard observation.

#### Interview: Transportation Staff (Human Resources)

- Do you receive an annual evaluation that includes an onboard observation? When was your last evaluation?



**Transportation Services Question 4A**

Does the agency help as many families as possible obtain transportation who need transportation for their children to attend the program?

1310.10(a)

**Targeted Questions for Transportation Services Question 4A**

**Interview: Transportation Manager (Family Support)**

- How does the agency help as many families as possible obtain transportation who need transportation for their children to attend the program?



#### Transportation Services Question 4B

If the agency has decided not to provide transportation services for either all or a portion of the children, does the agency provide reasonable assistance to the families of such children to arrange transportation to and from its activities? Are the specific types of transportation assistance being offered made clear to all prospective families in the program's recruitment announcements?

1310.10(b)

#### Targeted Questions for Transportation Services Question 4B

##### Document Review: Recruitment Materials

- Are the specific types of transportation assistance being offered made clear to all prospective families in the program's recruitment announcements?
- If the agency has decided not to provide transportation services for either all or a portion of the children, describe how the agency provides reasonable assistance to the families of such children to arrange transportation to and from its activities. In your description, indicate whether program recruitment announcements are in the languages of the children and families served by the program.



#### Transportation Services Question 5A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of transportation services, including contracted services, at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Transportation Services Question 5A

##### Document Review: Ongoing Monitoring Documents and Tools

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its transportation services as described through your interviews with the transportation manager and bus driver staff.

##### Interview: Transportation Staff, Transportation Manager (Ongoing Monitoring)

- How do you monitor delivery of the program's transportation services and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's transportation services? What is the process for reporting and documenting problems identified in the transportation service area? Who reports such information and to whom is it reported? How and where is it documented, if at all?



## Disabilities Services

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

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The Disabilities Services section of the Protocol is divided into six subsections:

*Section 1: Human Resources*

*Section 2: Coordinated Activities*

*Section 3: Outreach and Recruitment*

*Section 4: Evaluation and Development of IEP/IFSP*

*Section 5: Community Partners*

*Section 6: Ongoing Monitoring*





#### Disabilities Services Question 1A

Do content area experts assigned to oversee disabilities services have training and experience in securing and individualizing needed services for children with disabilities?

1304.52(d)(7)  
Link: PDM7B

#### Targeted Questions for Disabilities Services Question 1A

##### Document Review: Staff Files

- Before conducting your interviews, review the job description for the content area expert who oversees disabilities services. Describe the required training and experience in securing and individualizing needed services for children with disabilities.
- Review the personnel file, contract, or resume of the disabilities content area expert for documentation of training and experience in securing and individualizing needed services for children with disabilities. List the training, experience, and qualifications documented.

##### Interview: Disabilities Staff (Staffing)

- Describe how hired staff or consultants provide regularly scheduled and ongoing content area expertise and oversight.
- What training or experience do you have in securing and individualizing needed services for children with disabilities?



#### Disabilities Services Question 2A

APPLIES ONLY TO: Programs serving preschool-age children with disabilities

Does the Disabilities Coordinator work with the Education Manager in ongoing assessment and planning of activities for children with disabilities, taking into consideration the child's health needs?

1308.6(d)  
Links: DIS5D, PDM5A

#### Targeted Questions for Disabilities Services Question 2A

##### Document Review: Documentation of Coordination with ECD Manager

- Review documentation of coordination with the ECD Manager related to ongoing assessment and program planning (e.g., notes, meeting minutes). Ask disabilities staff to share with you documentation that demonstrates the ECD Manager's involvement in the assessment process and in planning activities.

##### Interview: Disabilities Staff (Child Assessments)

- Describe the developmental assessment process for children with disabilities. Who conducts the assessment and how often is it conducted?
- How is information from the developmental assessment incorporated into program planning to individualize educational activities for children with disabilities?

##### Interview: Disabilities Staff (Staff Communications)

- How do you coordinate with the ECD Manager in the ongoing assessment process and planning for activities? May I see your notes, meeting minutes, or other documentation that reflects on your coordination with the ECD Manager?
- How do you coordinate with the ECD Manager to plan activities for children with disabilities across program options?



#### Disabilities Services Question 2B

APPLIES ONLY TO: Programs serving preschool-age children

Does the Disabilities Coordinator work with health staff and teachers in the assessment process to help them identify children with disabilities and to ensure follow-up so the health needs of children with special needs are being met?

1308.18(a)  
Links: DIS5D, PDM5A

#### Targeted Questions for Disabilities Services Question 2B

##### Document Review: Child Files

- Review documentation of examples where a child with disabilities had health needs that were coordinated with health staff and/or teachers.

##### Interview: Disabilities Staff (Staff Communications)

- How do you work with health staff and teachers to identify children with disabilities and to ensure that the health needs of children with disabilities are being met? May I see your notes, meeting minutes or other documentation of your coordination with health services staff and teachers?

**Disabilities Services Question 2C**

APPLIES ONLY TO: Programs serving preschool-age children

Does the Disabilities Coordinator work with the staff person responsible for mental health to help teachers identify children with mental health-related disabilities?

1308.18(b)  
Links: DIS5D, PDM5A

**Targeted Questions for Disabilities Services Question 2C****Document Review: Child Files**

- Review documentation of examples where a child with disabilities had mental health needs coordinated with the Mental Health Manager.

**Interview: Disabilities Staff (Staff Communications)**

- How do you coordinate with the Mental Health Manager to help teachers identify children with mental health-related disabilities? [1308.18\(b\)](#)

**Interview: Disabilities Staff (Staff Coordination)**

- Has coordination with mental health services helped teachers identify mental health problems, such as depression, withdrawal, anxiety, or abuse, for a child with disabilities? If so, what were the circumstances? May I see your notes, meeting minutes or other documentation of your coordination with mental health services?



#### Disabilities Services Question 3A

APPLIES ONLY TO: Programs serving preschool-age children

Do recruitment efforts include recruiting children who have severe disabilities, including children who have been identified previously as having disabilities?

1308.5(f)  
Link: ERSEA1I

#### Targeted Questions for Disabilities Services Question 3A

##### Document Review: Recruitment Materials

- Describe information about serving children with disabilities, including children with severe disabilities.

##### Interview: Disabilities Staff (Enrollment & Recruitment)

- Can you share examples of outreach to other agencies resulting in referrals and acceptance of children with severe disabilities?
- During recruitment efforts, does the program reach out to other agencies serving children with severe disabilities? If so, which agencies?
- What kind of recruitment activities does the program have for children with severe disabilities? Are you currently serving children with severe disabilities?



**Disabilities Services Question 3B**

APPLIES ONLY TO: Programs serving preschool-age children

Does the program ensure that no child is denied placement based on a disability or its severity?

1308.5(c)(1), 1308.5(c)(2),  
1308.5(c)(3), 1308.5(c)(4)

**Targeted Questions for Disabilities Services Question 3B**

**Interview: Disabilities Staff (Enrollment & Recruitment)**

➤ Were any children with special needs denied enrollment or removed from the program? If so, what were the circumstances?

**Disabilities Services Question 4A**

APPLIES ONLY TO: Programs serving infants and toddlers

Are infants and toddlers suspected of having a disability referred promptly to the local intervention agency designated by the State Part C Plan?

1304.20(f)(2)(ii)

**Targeted Questions for Disabilities Services Question 4A****Document Review: Child Files**

- Review documentation of referrals to Part C providers and agencies and describe the program's referral process and timeline.

**Interview: Disabilities Staff (Child Assessments)**

- Does the program coordinate with Part C providers and services to plan needed evaluations, determine eligibility for Part C providers and services, and coordinate development of an Individualized Family Service Plan (IFSP)?
- What is the process and timeline for referral to Part C providers and services when an infant or toddler is suspected of having a disability?
  - Are infants and toddlers suspected of having a disability referred promptly to Part C providers and services?
  - Who makes the referral?
  - Who is responsible for coordinating the evaluations?

**Interview: Disabilities Staff (Individualization - IFSPs/IEPs)**

- Can you describe how children receive services defined in the IFSP or Individualized Education Program IEP, both from the Head Start program and other agencies?

**Interview: Disabilities Staff, Parent (Child Assessments)**

- How are parents supported to participate in the decisions regarding evaluations and individual program planning?



#### Disabilities Services Question 4B

APPLIES ONLY TO: Programs serving preschool-age children

Does the Disabilities Coordinator promptly refer preschool-age children suspected of possibly having a disability to the Local Education Agency (LEA) for further, formal evaluation as soon as the need becomes evident?

1308.6(e)(1)

#### Targeted Questions for Disabilities Services Question 4B

##### Document Review: Child Files

- Review referrals and follow-up logs for children with disabilities, if available.

##### Interview: Disabilities Staff (Child Assessments)

- What is the process and timeline for referral to the LEA when a child is suspected of having a disability?
- What is the process for following up with the LEA to ensure that children are evaluated formally? Can you share examples of how timelines, from identification to referral, were met for a child?





#### Disabilities Services Question 4C

APPLIES ONLY TO: Programs serving preschool-age children

Does the program work with the Local Education Agency (LEA) to assure that parents are informed and provide written parental consent before evaluations are conducted?

1308.6(e)(3)

#### Targeted Questions for Disabilities Services Question 4C

##### Document Review: Child Files

- Review examples of parental written consent provided before an initial evaluation was conducted to determine whether a child has a disability.

##### Interview: Disabilities Staff (Child Assessments)

- Can you share examples of parental written consent before an evaluation is conducted to determine whether a child has a disability? How is consent received from families who do not speak English?

**Disabilities Services Question 4D**

When special education and related services cannot be provided on-site, has the program arranged for or provided transportation for children with disabilities to and from the program, special clinics, or other service providers?

Note: Transportation includes adapted buses equipped to accommodate wheelchairs or other such devices, if required.

1308.4(h)(6), 1310.22(a),  
1310.22(b)

**Targeted Questions for Disabilities Services Question 4D****Interview: Disabilities Staff (Adaptation for Children with Disabilities)**

- Do you have children with disabilities who need services you do not provide here and who need to be transported to other places?
- Does the transportation comply with the Americans with Disabilities Act of 1990 (ADA)? [1310.22\(b\)](#)
- How do you ensure that the transportation is adapted to meet a child's special needs? [1310.22\(a\)](#)
- If required in the child's Individualized Education Program (IEP) and not provided by the LEA, how does the grantee provide transportation to enable the child to access related services?

**Observation: Transportation-Disabilities**

- Does the transportation comply with the Americans with Disabilities Act of 1990 (ADA)? [1310.22\(b\)](#)



#### Disabilities Services Question 5A

APPLIES ONLY TO: Programs serving infants and toddlers

Is transition planning undertaken for children on an IFSP and their families at least 6 months before the child's third birthday?

1304.41(c)(2)  
Link: PDM5B

#### Targeted Questions for Disabilities Services Question 5A

##### Document Review: Child Files

- Review grantee records to determine whether transition planning was undertaken at least 6 months before the child's third birthday.

##### Interview: Disabilities Staff (Transitions)

- What are the transition activities?
- When do transitions begin for children on an IFSP?

**Disabilities Services Question 5B**

APPLIES ONLY TO: Programs serving preschool-age children

Does the Head Start (HS) program help families prepare for transitions regarding disabilities services, for children entering Head Start from infant and toddler programs, as well as for children leaving Head Start for subsequent placements?

1308.21(a)(1), 1308.21(a)(6),  
1308.21(a)(10), 1308.21(b)  
Link: PDM5B

**Targeted Questions for Disabilities Services Question 5B****Document Review: Transition Plans**

- Using examples from children's transition plans, describe the program's transition processes for special needs children leaving Head Start for public schools or other placement. 1308.21(b)

**Interview: Disabilities Staff (Transitions)**

- How do you assist parents in the transition of children from Head Start to public school or other placement, beginning early in the program year? 1308.21(b)
- How do you coordinate with schools or other agencies to ensure that individual Early Head Start or Head Start children's relevant records, including IEPs and IFSPs, are transferred to the appropriate programs? When do transitions begin?
- How does the program build parent confidence, skills, and knowledge in accessing resources and advocating to meet their children's special needs? 1308.21(a)(10)
- How does the program inform parents of their rights under the Individuals with Disabilities Education Act (IDEA)? 1308.21(a)(6)
- What are some specific examples of transitions for children who have entered Head Start from Early Head Start (EHS) and from other Part C programs in the community? 1308.21(a)(1)
- What are the program's transition practices for toddlers entering Head Start? How does the program support parents of children with disabilities entering from infant and toddler programs? 1308.21(a)(1)

**Interview: Parent (Transitions)**

- For parents who have experienced a transition into Head Start recently or parents who are in the process of a transition from Head Start: How did the program assist your child with the transition process?



#### Disabilities Services Question 5C

Has the program made specific efforts to develop interagency agreements with Local Education Agencies (LEAs) and other agencies (Part C) within the service area to enable children and their families' effective participation?

1304.41(a)(4)

#### Targeted Questions for Disabilities Services Question 5C

##### Document Review: Interagency Agreement

- Review interagency agreements to determine whether:
  - Current agreements exist with LEAs and other agencies in the service area.
  - Current agreements exist with agencies serving infants and toddlers.

##### Interview: Disabilities Staff (Community Partnerships)

- Do current interagency agreements exist with all LEAs in the service area?
- Do interagency agreements exist with agencies serving infants and toddlers?



**Disabilities Services Question 5D**

APPLIES ONLY TO: Programs serving preschool-age children

Does the program have a disabilities service plan to ensure that all components of Head Start are integrated?

1308.4(a)(1)

**Targeted Questions for Disabilities Services Question 5D**

**Document Review: Disabilities Service Plan**

- Review the disabilities service plan to determine whether all Head Start components are integrated.

**Document Review: Summary Analysis**

- Based on your review of the coordination between the Disabilities Coordinator and the Education Manager, teachers, health staff, and mental health staff (DIS2A, 2B, and 2C), describe the level of integration of these services.



#### Disabilities Services Question 5E

APPLIES ONLY TO: Programs serving preschool-age children

Does the Head Start program use a disabilities service plan and adapt it as necessary to guide all aspects of its effort to serve children with disabilities?

1308.4(d)  
Link: PDM3E

#### Targeted Questions for Disabilities Services Question 5E

##### Document Review: Disabilities Service Plan

- Check the disabilities service plan date to ensure the plan is updated annually.

##### Interview: Disabilities Staff (Community Partnerships)

- How does the program use a disabilities service plan in shaping program services for children with disabilities? Listen for how and whether the plan includes transportation, coordination with LEA, and working with parents to ensure their involvement.

##### Interview: Disabilities Staff (Service Plans)

- How do you update the disabilities service plan annually to reflect the changing needs for disabilities services in your community?



#### Disabilities Services Question 6A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of disabilities services at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Disabilities Services Question 6A

##### Document Review: Ongoing Monitoring Documents and Tools

- Use any ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its disabilities services as described through your interview with disabilities staff.

##### Interview: Disabilities Staff (Ongoing Monitoring)

- How do you monitor delivery of the program's disabilities services and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's disabilities services? What is the process for reporting and documenting problems identified in the disabilities service area? Who reports such information and to whom is it reported? How and where is it documented, if at all?





## Mental Health Services

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The Mental Health Services section of the Protocol is divided into three subsections:

*Section 1: Human Resources*

*Section 2: Implementation of Mental Health Services*

*Section 3: Ongoing Monitoring*

**Mental Health Services Question 1A**

Are content area experts assigned to oversee mental health services licensed or certified mental health professionals with experience and expertise in serving young children and their families?

1304.52(d)(4)  
Link: PDM7B

**Targeted Questions for Mental Health Services Question 1A****Document Review: Staff Files**

- Before conducting your interviews, review the job description for the content area expert who oversees mental health services. Describe the required license or certification for mental health professionals with experience and expertise in serving young children and their families.
- Review the personnel file, contract, or resume of the mental health content area expert for documentation of his or her license or certification, as well as experience serving young children and their families. List the training, experience, and qualifications documented. Note the accrediting body for the license or certification.

**Interview: Health Staff, Mental Health Staff/Consultant (Staffing)**

- Are you a licensed or certified mental health professional? If not, does the program have a contract with a licensed or certified mental health professional who supports the provision of mental health services?

**Interview: Mental Health Consultant, Mental Health Staff/Consultant (Staffing)**

- Describe your training or experience in serving young children and their families.

**Interview: Mental Health Staff/Consultant (Staffing)**

- Describe how hired staff or consultants provide regularly scheduled and ongoing content area expertise and oversight.

**Mental Health Services Question 2A**

Does the program collaborate with parents on issues related to parent education on child mental health?

1304.24(a)(1)(i),  
1304.24(a)(1)(ii),  
1304.24(a)(1)(iii),  
1304.24(a)(1)(iv)  
Link: PDM5B

**Targeted Questions for Mental Health Services Question 2A**
**Document Review: Education Materials**

- Based on your review of education materials for parents, describe how the program educates parents about appropriate behaviors and varying individual temperaments, and educates parents and staff on appropriate responses to their children's behaviors.

**Interview: ECD Manager, Mental Health Staff/Consultant (Parent Involvement)**

- How do you educate parents about appropriate behaviors and varying individual temperaments? How do you educate parents and staff on appropriate responses to child behaviors? 1304.24(a)(1)(iii)
- How do you help parents understand how to strengthen home environments to support and nurture child development? 1304.24(a)(1)(iv)

**Interview: ECD Manager, Mental Health Staff/Consultant (Staff Observations)**

- How do you share staff observations with parents and help parents understand child development and their child's behavior? 1304.24(a)(1)(ii)

**Interview: Mental Health Staff/Consultant, Teaching Staff (Parent Involvement)**

- How do you solicit parents' information, observations, and concerns about their children's mental health? 1304.24(a)(1)(i)

**Interview: Parent (Parent Involvement)**

- How does program staff learn about your observations and concerns about your child's mental health? 1304.24(a)(1)(i)
- How does the program educate you about your child's appropriate behavior? Does the program offer feedback on how to respond to your child's behavior? 1304.24(a)(1)(iii)

**Mental Health Services Question 2B**

Does on-site mental health consultation involve training and education on how to design and implement program practices responsive to the behavioral and mental health concerns of an individual child or group of children?

1304.24(a)(3)(i)  
Link: PDM7I

**Targeted Questions for Mental Health Services Question 2B****Interview: Home Visitor, Teaching Staff (Staff Coordination)**

- Has the mental health professional helped you design practices responsive to behavioral and mental health concerns you have about a child or group of children? If so, can you describe the situation and the process? [1304.24\(a\)\(3\)\(i\)](#)

**Interview: Mental Health Staff/Consultant (Staff Coordination)**

- Can you share examples of working with staff and parents to implement program practices that respond to behavioral and mental health concerns about an individual child or group of children? Review available documents to verify.
- How do you learn about a teacher's concerns about children's behavior and mental health? What do you do to help teachers through this process?

**Interview: Teaching Staff (Mental Health Referrals)**

- How do you communicate concerns about behavior and mental health in children? What do you do to help families through this process? Can you share examples of practices you have completed for an individual child, and for a group of children?

### Mental Health Services Question 2C

Does the certified or licensed mental health professional have a schedule that enables timely and effective identification of and intervention in family and staff concerns about a child?

Note: This compliance question does not focus on whether a mental health professional is in the classroom.

1304.24(a)(2)  
Link: PDM3F

### Targeted Questions for Mental Health Services Question 2C

#### Document Review: Contract/MOA with Mental Health Consultant

- Review the contract or Memorandum of Agreement (MOA) with the mental health consultant to determine the schedule and services expected.

#### Document Review: Summary Analysis

- Review a copy of the Community Assessment Summary from the RTL, RC, or PDM Reviewer. Based on your review, consider the types of services parents are requesting and the population demographics (i.e., types of services people in community typically use). Based on that information and your understanding of the program, has the program established the appropriate frequency of visits to assess mental health concerns?

#### Interview: Disabilities Staff (Staff Coordination)

- Has coordination with mental health services helped teachers identify mental health problems, such as depression, withdrawal, anxiety, or abuse, for a child with disabilities? If so, what were the circumstances? May I see your notes, meeting minutes or other documentation of your coordination with mental health services?

#### Interview: ECD Manager, Home Visitor, Teaching Staff (Staff Coordination)

- Describe how you coordinate with the mental health services staff. What happens when a teacher or home visitor has a concern about a child? Can you share an example of a referral made this year and its resolution? [1304.24\(a\)\(2\)](#)

#### Interview: Health Staff (Providing Health Services)

- Do you obtain guidance from the mental health or child development specialist on how to use screening findings? How do you receive information? How do you use this information? [1304.20\(b\)\(2\)](#)

#### Interview: Mental Health Staff/Consultant (Implementing Mental Health Services)

- Are all mental health concerns in the process of being addressed? Can you share an example of a recent intervention to address a concern?
- Describe your process for identifying staff or family mental health concerns about a child?
- How are you involved in selection of appropriate screening instruments and use of screening results?
- How often do you visit each setting? How is the schedule implemented across all program options? How do you define "regular schedule"?
- What is the typical time between identification of a mental health concern and intervention?
- What role do you play in the program's efforts to conduct screening to identify children who might require formal evaluation of behavioral and social-emotional concerns?
- When a concern about a child is identified, what is your process for addressing that concern? How do you know when it is



**Targeted Questions for Mental Health Services Question 2C**

time to intervene?

**Interview: Mental Health Staff/Consultant (Mental Health Referrals)**

- Have there been requests for mental health referrals?



#### Mental Health Services Question 2D

Do the mental health program services include a regular schedule of on-site mental health consultation involving the mental health professional, program staff, and parents on how to assist in providing special help for children with atypical behavior or development?

1304.24(a)(3)(iii)

#### Targeted Questions for Mental Health Services Question 2D

##### Document Review: Schedule of MH Services

- Verify that the program services include a regular schedule of mental health consultation involving the mental health professional, program staff and parents.

##### Interview: Mental Health Staff/Consultant (Implementing Mental Health Services)

- Can you share examples of situations where staff helped parents work with children with atypical behavior or development?
- Describe how the program's on-site mental health consultation assists in providing special help for children with atypical behavior or development.
- How do you ensure that children with atypical behavior receive the recommended mental health services?



### Mental Health Services Question 3A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of mental health services at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

### Targeted Questions for Mental Health Services Question 3A

#### Document Review: Ongoing Monitoring Documents and Tools

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its mental health services as described through your interview with mental health staff.

#### Interview: Mental Health Staff/Consultant (Ongoing Monitoring)

- How do you monitor delivery of the program's mental health services and compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's mental health services? What is the process for reporting and documenting problems identified in the mental health service area? Who reports such information and to whom is it reported? How and where is it documented, if at all?





## Family and Community Services

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

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The Family and Community Services section of the Protocol is divided into six subsections:

*Section 1: Human Resources*

*Section 2: Building Relationships with Families*

*Section 3: Strengthening Families through the Family Partnership Agreement Process*

*Section 4: Encouraging Parent Participation*

*Section 5: Building and Maintaining Community Partnerships*

*Section 6: Ongoing Monitoring*



#### Family and Community Services Question 1A

Do content area experts assigned to oversee family and community services have training and experience related to social services, human services, or family services?

1304.52(d)(5)  
Link: PDM7B

#### Targeted Questions for Family and Community Services Question 1A

##### Document Review: Staff Files

- Before conducting your interviews, review the job description for the content area expert who oversees family and community services. Describe the required training and experience related to social services, human services, or family services.
- Does the family and community services content area expert job description emphasize fluency in the language or languages spoken by the families that the program serves?
- Review the personnel file, contract, or resume of the family and community services content area expert for documentation of training and experience related to social services, human services, or family services. List the degree or degrees, training, experience, and qualifications documented.

##### Interview: FCS Staff (Staffing)

- Describe how hired staff or consultants provide regularly scheduled and ongoing content area expertise and oversight.
- What training or experience related to social services, human services, or family services do you have?



#### Family and Community Services Question 1B

Are parent involvement services supported by staff or consultants with training, experience, and skills in helping parents advocate and make decisions for their young children and families?

1304.52(d)(6)  
Link: PDM7B

#### Targeted Questions for Family and Community Services Question 1B

##### Interview: FCS Staff (Staffing)

- Explain your experience in organizing or facilitating parent education, advocacy, or support groups.
- What training, experience, and skills do you have in helping parents advocate and make decisions for their young children and families? What experience do you have in making referrals (e.g., health, mental health, and disabilities) for families?

**Family and Community Services Question 2A**

Are opportunities for interaction between staff and families made available to parents throughout the year? Are they respectful of each family's cultural, ethnic, and linguistic diversity?

1304.40(a)(4), 1304.40(a)(5)

**Targeted Questions for Family and Community Services Question 2A****Document Review: Newsletters, Calendars, Etc.**

- Review newsletters, calendars, event flyers, etc. for documentation that events are planned and that opportunities exist for interaction between staff and families throughout the year.

**Interview: FCS Staff (Communication with Families)**

- Do you plan activities at varying times during the day and week (e.g., at breakfast, end of the day, weekends) to encourage as many parents as possible to participate? 1304.40(a)(4)
- Do you provide alternative work schedules to allow staff to interact with working families during weekend events (e.g., picnics, religious and Tribal ceremonies, or other cultural events), if necessary? 1304.40(a)(4)
- How are meetings and interactions respectful of families' diversity and cultural and ethnic backgrounds, including families who might be unable to read or speak English? Can you share materials or plans that show how the program implements this requirement? 1304.40(a)(5)
- How do you consider the needs of family members with disabilities when planning meetings and activities? 1304.40(a)(4)
- When and how do you interact with families throughout the program year? 1304.40(a)(4)

**Interview: Parent (Communication with Families)**

- Are activities planned at varying times during the day and week (e.g., at breakfast, end of the day, weekends) to encourage you to participate?
- Do program staff interact with you during weekend events (e.g., picnics, religious and Tribal ceremonies, or other cultural events)?



#### Family and Community Services Question 2B

Are classroom staff and home visitors able to communicate with families they serve either directly or through an interpreter? Are they familiar with the families' ethnic backgrounds?

1306.20(f)  
Link: PDM5B

#### Targeted Questions for Family and Community Services Question 2B

##### Document Review: Materials for Families

- Review materials available for both English and non-English speaking families. Into what additional languages have materials been translated? Do these languages reflect languages spoken by the program's families?

##### Interview: ECD Manager (Communication with Families)

- How do you familiarize staff with the families' ethnic backgrounds?

##### Interview: Head Start Director (Communication with Families)

- What steps are taken when staff are unable to communicate directly with parents?
- What strategies do you use to ensure communication with families in their own language?



#### Family and Community Services Question 2C

Does the program initiate appropriate support for families whose children have been absent (unexcused) for 4 or more consecutive days?

1305.8(b)  
Links: ERSEA1G, PDM5B

#### Targeted Questions for Family and Community Services Question 2C

##### Document Review: Child Files

- Describe how staff communicate with families regarding absences greater than 4 consecutive days.

##### Interview: FCS Staff (Communication with Families)

- How do you reach out to parents if families have no phone or are otherwise hard to reach? What do you do if you cannot reach the family? Listen for staff efforts to reach out to families beyond phone and notes sent home.
- What is the process for reaching out to families whose child has been absent for 4 or more consecutive days? When absences result from temporary family situations, what kind of family support procedures does the program initiate?



### Family and Community Services Question 3A

Does the program, in partnership with parents (and guardians), conduct a family assessment that identifies parents' needs and interests?

642(b)(7)

### Targeted Questions for Family and Community Services Question 3A

#### Document Review: Family Assessment

- Review a sample of family assessment documentation. Do family assessments identify parents' needs and interests?

#### Interview: FCS Staff (Parent Involvement)

- How do you communicate with parents about the benefits of parent involvement?
- What is your process for determining whether parents' needs and interests have changed over time?
- What opportunities do parents have to determine their family needs and educational interests?

**Family and Community Services Question 3B**

Is a strength-based and family-driven, collaborative partnership-building process in place so all families have the opportunity to participate and, if parents choose, to develop and implement an individualized partnership agreement?

1304.40(a)(1), 1304.40(a)(2)  
Link: PDM6A

**Targeted Questions for Family and Community Services Question 3B****Document Review: Child Files**

- Review family contact notes or Family Partnership Agreements, if written. Describe the timetables and strategies for achieving family goals.

**Interview: FCS Staff (Communication with Families)**

- How do you approach situations in which families are not ready, or select not to participate in, the family partnership process? [1304.40\(a\)\(1\)](#)
- How do you track families' progress in meeting their goals? How do you know when families have met their goals? [1304.40\(a\)\(2\)](#)
- What is your process for determining whether a family's goals have changed over time? [1304.40\(a\)\(2\)](#)

**Interview: FCS Staff, Parent (Communication with Families)**

- Describe the process for developing trusting relationships with families and encouraging them to participate in individualized family partnerships. When does this process begin? [1304.40\(a\)\(1\)](#)





### Family and Community Services Question 3C

Has the program identified any preexisting family plans and coordinated with other agencies to build on existing plans to reduce burden on parents and avoid duplication of services, where possible?

1304.40(a)(3)

### Targeted Questions for Family and Community Services Question 3C

#### Document Review: Preexisting Family Plans

- Ask FCS staff to provide documentation of preexisting family plans. Is there documentation of coordination with other agencies?

#### Interview: FCS Staff (Communication with Families)

- How did you build on preexisting family partnership plans (from other agencies)?
- How do you know whether a preexisting family plan exists? Does the program ask parents for consent or release of information for discussions with other agencies, when plans do exist?

**Family and Community Services Question 3D**

Does the program provide, either directly or through referral, resources responsive to families' identified needs and interests?

1304.40(b)(1),  
1304.40(b)(1)(i),  
1304.40(b)(1)(ii),  
1304.40(b)(1)(iii)

**Targeted Questions for Family and Community Services Question 3D****Document Review: Newsletters, Calendars, Etc.**

- Review newsletters, calendars, event flyers, etc. for information provided to families on available resources that meet their needs and interests.

**Interview: FCS Staff (Community Partnerships)**

- How do you determine that the services provided through a partner community organization respond to the families' needs? Has the program sought Health Services Advisory Committee (HSAC) input on health providers and resources in the community?

**Interview: FCS Staff (Support Services)**

- Can you share examples of educational resources, such as job training or employment services, continuing education and information, or education on mental health or wellness? 1304.40(b)(1)(iii)
- Can you share examples of how you have helped families access emergency services or resources, such as food, housing, clothing, or transportation? 1304.40(b)(1)(i)
- Has the community experienced community-wide emergencies or crises that affected many Head Start (HS) families? If so, what kind of help, if any, did the program provide in response, either directly or through referral?
- How do you know whether a resource or referral is meeting the families' needs? 1304.40(b)(1)

**Interview: FCS Staff, Parent (Support Services)**

- How are opportunities to participate in education or appropriate interventions provided to families in the following areas:
  - Counseling programs;
  - Substance abuse programs;
  - Child abuse and neglect education;
  - Domestic violence services;
  - Prevention programs for at-risk families; and
  - Mental health education? 1304.40(b)(1)(ii)

**Interview: Mental Health Staff/Consultant (Implementing Mental Health Services)**

- Can you share examples of situations where staff helped parents work with children with atypical behavior or development?

**Interview: Parent (Support Services)**

- What kinds of resources or referrals has the program helped you access? Did the resources you received meet your needs? Why or why not?



### Family and Community Services Question 3E

Does the program provide, either directly or through referrals, opportunities for parents and children to participate in family literacy services?

1304.40(e)(4),  
1304.40(e)(4)(i),  
1304.40(e)(4)(ii)

### Targeted Questions for Family and Community Services Question 3E

#### Interview: FCS Staff (Family Literacy)

- Can you share examples of materials or services provided by your program that relate to the four major family literacy activities?
- Describe how your program provides services that address the four major activities defining family literacy in Head Start:
  - Parent and child interactive literacy activities;
  - Training for parents as the primary teachers of their children;
  - Parent training that leads to economic self sufficiency and financial literacy; and
  - Age-appropriate education for children that prepares them for success in school and life.
- How do you help parents, as adult learners, identify and address their own literacy goals? 1304.40(e)(4)(ii)
- How would you describe your program's approach to providing family literacy services? 1304.40(e)(4)(i)

**Family and Community Services Question 4A**

Are parents welcomed as visitors during all program hours? Are they encouraged to observe their children often and participate with children in group activities?

1304.40(d)(2)

**Targeted Questions for Family and Community Services Question 4A****Interview: FCS Staff (Parent Involvement)**

- Are developmental assessments shared with parents throughout the program year?
- Are parents included in educational decisions related to their children? Can you describe the decision-making process?
- Have you developed materials or activities to encourage parent participation and make parents feel welcome at the program? Can you describe these materials or activities?

**Interview: Parent (Parent Involvement)**

- Does the program require you to participate?
- Has the program developed materials or activities to encourage your participation and make you feel welcome at the program? Can you describe the materials or activities?
- Is the program open for you to visit during all hours of operation? Are you encouraged to observe or participate in all activities with your child at the program?

**Family and Community Services Question 4B**

Are parents invited to become integrally involved in developing the program's curriculum and approach to child development and education, given opportunities to increase their child observation skills and to share assessments with staff that will help plan the learning experiences, and encouraged to participate in staff-parent conferences and home visits to discuss their child's development and education?

1304.21(a)(2)(i),  
1304.21(a)(2)(ii),  
1304.21(a)(2)(iii)  
Link: PDM3F

**Targeted Questions for Family and Community Services Question 4B****Interview: ECD Manager, Head Start Director, Teaching Staff (Parent Involvement)**

- How and when do you provide parents with opportunities to increase their child observation skills and to share their assessments with staff? 1304.21(a)(2)(ii)

**Interview: FCS Staff, Parent, Teaching Staff (Parent Involvement)**

- How do staff encourage parents to participate in staff-parent conferences and home visits? 1304.21(a)(2)(iii)

**Interview: Parent (Parent Involvement)**

- Have you been encouraged by the program to create verbal or written stories with your children in your home language? Can you describe activities in which you participated?
- Have you been invited to make suggestions for classroom activities and given opportunities to increase your child observation skills and share assessments? How did program staff include you in these activities? 1304.21(a)(2)(ii)

**Interview: Teaching Staff (Parent Involvement)**

- Do you seek parents' ideas for classroom activities and teaching approaches? How do you solicit parent suggestions? Do you have examples of materials you use? 1304.21(a)(2)(i)



**Family and Community Services Question 4C**

Does the program help parents enroll and participate in a system of ongoing family health care?

1304.40(f)(2)(i)

**Targeted Questions for Family and Community Services Question 4C**

**Interview: FCS Staff (Communication with Families)**

- Do you discuss a family's options for obtaining health insurance or low-cost medical care, if the family is ineligible for Medicaid? Has the program developed materials or resources?
- What is the process for providing names and addresses of medical practices, clinics, or other health care organizations to families?

**Family and Community Services Question 5A**

Has the program taken affirmative steps to establish ongoing collaborative partnerships with community organizations?

1304.41(a)(2)  
Link: PDM3F

**Targeted Questions for Family and Community Services Question 5A****Interview: FCS Staff (Community Partnerships)**

- Has the program established ongoing collaborative relationships with health care and mental health providers, such as local health departments, community health centers, managed care organizations, medical or dental schools, and professional associations? Can you describe these partnerships and specify the agencies with which partnerships have been formed.
- How do these partnerships support families' needs (e.g., improve, share, and augment services for children and families)? What documents and materials does the program have, if available, to support demonstration of its community partnership collaborations? In your notes, indicate the type or types of documentation (e.g., written agreements, informal agreements, correspondence, in-kind, meeting minutes).
- How do you determine that the services provided through a partner community organization respond to the families' needs? Has the program sought Health Services Advisory Committee (HSAC) input on health providers and resources in the community?
- How does the program determine which community partnerships to pursue?

**Interview: Head Start Director (Community Partnerships)**

- Does the program have a memorandum of understanding with the Local Education Agency (LEA)?



**Family and Community Services Question 5B**

Has the program established and maintained Health Services Advisory Committees (HSAC) that include parents, professionals, and other community volunteers?

1304.41(b)

**Targeted Questions for Family and Community Services Question 5B**

**Document Review: HSAC Roster and Meeting Minutes**

- Review the HSAC roster and meeting minutes to determine the frequency of meetings, relevancy of topics, and member attendance.

**Interview: FCS Staff (Parent Involvement)**

- How does the HSAC help the program stay abreast of current community health needs and recommend necessary interventions for children and families?
- Who are the HSAC members? Do you have a roster of the current HSAC members?



**Family and Community Services Question 5C**

Does the program have procedures to support successful transitions for enrolled children and families that provide coordination with other agencies as well as outreach to encourage communication between Early Head Start, school principals, and others involved in supporting children and families through transitions, including joint transition meetings?

1304.41(c)(1),  
1304.41(c)(1)(i),  
1304.41(c)(1)(ii),  
1304.41(c)(1)(iii),  
1304.41(c)(2),  
1304.41(c)(1)(iv), 642A(a)(5)

**Targeted Questions for Family and Community Services Question 5C****Interview: ECD Manager (Transitions)**

- How are developmentally appropriate expectations for children's learning and development shared with the school or other programs as the child transitions? 1304.41(c)(1)(iii)
- How do you conduct outreach to encourage parents and elementary school teachers to discuss the educational, developmental, and other needs of each child? 1304.41(c)(1)(ii)
- How do you help families understand how parent involvement relates to their child's academic success and teach them strategies for maintaining parent involvement as their child moves from Early Head Start to Head Start or elementary school?
- How do you work with parents who speak a language other than English to achieve effective transitions?
- How does the program organize and participate in joint, transition-related training for school and Head Start staff? 1304.41(c)(1)(iv)
- What are the procedures for transferring, with parental consent, Head Start program records for each participating child to the school or program where the child will enroll? 1304.41(c)(1)(i)

**Interview: FCS Staff (Transitions)**

- What are the program's transition policies and procedures to support children transitioning to school? Who was involved with developing these policies? Listen to see discover whether the local educational agency was engaged in establishing of such policies. 642A(a)(5)

**Family and Community Services Question 5D**

Does the program have procedures to help parents become advocates for their children during transitions both into Early Head Start or Head Start, from the home or other childcare setting, and from Head Start to elementary school, a Title I of the Elementary and Secondary Education Act preschool program, or a childcare setting?

1304.40(h)(1)

**Targeted Questions for Family and Community Services Question 5D****Interview: FCS Staff (Support Services)**

- How do you know whether a resource or referral is meeting the families' needs? 1304.40(b)(1)

**Interview: FCS Staff (Transitions)**

- How do you help parents become advocates for their children during transitions? What kinds of information do you provide to parents? Is it in a language the parents understand?

**Interview: Parent (Transitions)**

- For parents who have transitioned recently into Head Start: How did program staff help you during this transition from Early Head Start or childcare to Head Start?



#### Family and Community Services Question 6A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of family and community services and parent involvement at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Family and Community Services Question 6A

##### Document Review: Ongoing Monitoring Documents and Tools

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its family and community services as described through your interview with family community services staff.

##### Interview: FCS Staff (Ongoing Monitoring)

- How do you monitor delivery of the program's family and community services, parent involvement, and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's family and community services? What is the process for reporting and documenting problems identified in the family and community services area? Who reports such information and to whom is it reported? How and where is it documented, if at all?



## Education and Early Childhood Development Services

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Education and Early Childhood Development section of the Protocol is divided into six subsections:

- Section 1: Human Resources*
- Section 2: Curriculum, Individualization, and Assessment*
- Section 3: Social-Emotional Development*
- Section 4: Cognitive and Language Development*
- Section 5: Physical Development*
- Section 6: Ongoing Monitoring*

### Education and Early Childhood Development Services Question 1A

Do the content area experts assigned to oversee education and early childhood development services have training and experience in theories and principles of child growth and development, early childhood education, and family support? Do they also meet the qualifications for classroom teachers, as specified in section 648A of the Head Start Act?

1304.52(d)(1)  
Link: PDM7B

### Targeted Questions for Education and Early Childhood Development Services Question 1A

#### Document Review: Staff Files

- Before conducting your interviews, review the job description for the content area expert who oversees education and early childhood development services. Describe the required training and experience in theories and principles of child growth and development, early childhood education, and family support. Does the job description reference once or more of the qualifications listed below?
  - CDA credential appropriate to the age of children being served;
  - State-awarded certificate for preschool teachers that meets or exceeds the requirements for a CDA credential;
  - Associate's degree in early childhood education;
  - Associate's degree in a related field and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children;
  - Bachelor's degree and admission into the Teach For America program; successful completion of a rigorous early childhood content exam, such as the Praxis II; participation in a Teach For America summer training institute that includes teaching preschool children; and ongoing professional development and support from Teach For America's professional staff; and
  - Bachelor's or advanced degree in any field and coursework equivalent to a major relating to early childhood education with experience teaching preschool-age children.
- Review the personnel file, contract, or resume of the education and early childhood development content area expert for documentation of training and experience related to child growth and development, early childhood education, and family support. List the degrees, training, experience, and qualifications documented.

#### Interview: ECD Manager (Staffing)

- Describe how hired staff or consultants provide regularly scheduled and ongoing content area expertise and oversight.
- What training and experience do you have in child growth and development, early childhood education, and family support?

**Education and Early Childhood Development Services Question 1B**

Do teachers have the required qualifications and experience?

648A(a)(3)(A), 1304.52(f),  
1304.52(h)(1)  
Link: PDM7B

**Targeted Questions for Education and Early Childhood Development Services Question 1B****Document Review: Staff Files**

- Does the job description for Family Child Care providers include the required qualifications (listed below)?
  - Early childcare experience
  - Enrollment in a child development associate (CDA) credential or associate's or bachelor's program in child development or early childhood education within 6 months of beginning service provision

(Note: For previously contracted providers, within 6 months of January 8, 2008, all family child care providers must have enrolled in a credentialing program. Family Child Care providers must acquire the CDA credential or associate's or bachelor's degree within 2 years of February 7, 2008, or, thereafter, within 2 years of beginning service provision.)
- Does the job description for infant and toddler teachers reference the required qualifications (listed below)? [1304.52\(f\)](#)
  - Training in effective communication with infants and toddlers and their parents and other staff
  - Training in safety issues (e.g., reducing the risk of Sudden Infant Death Syndrome)
  - CDA for infant and toddler caregivers or equivalent credential within 1 year of hire

Review staff files for infant and toddler teaching staff and document that every teacher has the required credentials.

Do preschool classroom teachers emphasize fluency in the languages spoken by families served by the program?
- Does the job description for teachers reference once or more of the qualifications listed below?
  - CDA credential appropriate to the age of children being served
  - State-awarded certificate for preschool teachers that meets or exceeds the requirements for a CDA credential
  - Associate's degree in early childhood education
  - Associate's degree in a related field and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children
  - Bachelor's degree and admission into the Teach For America program; successful completion of a rigorous early childhood content exam, such as the Praxis II; participation in a Teach For America summer training institute that includes teaching preschool children; and ongoing professional development and support from Teach For America's professional staff
  - Bachelor's or advanced degree in any field and coursework equivalent to a major relating to early childhood education with experience teaching preschool-age children
- Does the teacher job description or FCC contract emphasize fluency in the languages spoken by the families served by the program?
- Review personnel files, contracts, or resumes of center-based preschool teachers and list the degree, training, experience, and qualifications documented. [648A\(a\)\(3\)\(A\)](#)

Indicate whether at least one teacher in each classroom has at least one of the required credentials:

  - Child development associate credential (CDA) appropriate to the age of children being served;



#### Targeted Questions for Education and Early Childhood Development Services Question 1B

- State-awarded certificate for preschool teachers that meets or exceeds the requirements for a CDA credential;
- Associate's degree in early childhood education;
- Associate's degree in a related field and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children;
- Bachelor's degree; admission into the Teach For America program, passed a rigorous early childhood content exam, such as the Praxis II, participated in a Teach For America summer training institute that includes teaching preschool children, and is receiving ongoing professional development and support from Teach For America's professional staff; or
- Bachelor's or advanced degree in any field and coursework equivalent to a major relating to early childhood education with experience teaching preschool age children.

- Review personnel files, contracts, or resumes of infant/toddler teaching staff, and list the degree(s), training, experience, and qualifications documented.

Does every infant/toddler teacher have the required credentials (listed below)?

- Training on effective communication with infants and toddlers and their parents and other staff;
- Training on safety issues (e.g., reducing the risk of Sudden Infant Death Syndrome); and
- CDA for Infant and Toddler Caregivers or equivalent credential within one year of hire.

- Review the provider contract for family child care providers and list the degree(s), training, experience and qualifications documented. [1304.52\(h\)\(1\)](#)

Does each provider have the required qualifications (listed below)?

- Previous early childcare experience
- Enrollment in a CDA credential or associate's or bachelor's program in child development or early childhood education within 6 months of beginning service provision

Note: For previously contracted providers, within six months of January 8, 2008, all family child care providers must have enrolled in a credentialing program. Family Child Care providers must acquire the CDA credential or Associate's or Bachelor's degree within two years of February 7, 2008, or, thereafter, within two years of beginning service provision.



#### Education and Early Childhood Development Services Question 1C

Do home visitors have the required knowledge and experience in child development and early childhood education; principles of child health, safety, and nutrition; adult learning principles; and family dynamics?

1304.52(e)  
Link: PDM7B

#### Targeted Questions for Education and Early Childhood Development Services Question 1C

##### Document Review: Staff Files

- Does the home visitor job description emphasize fluency in the languages spoken by the families that the program serves?
- Does the home visitor job description indicate that the home visitor position requires knowledge and experience in: [1304.52\(e\)](#)
  - Child development and early childhood education;
  - Principles of child health, safety, and nutrition;
  - Adult learning principles;
  - Family dynamics;
  - Communicating and motivating adults;
  - Community resources; and
  - Linking families with appropriate resources.





**Education and Early Childhood Development Services Question 1D**

Does the program ensure appropriate class size based on the age of the predominant number of children in the class?

1306.32(a)(2), 1306.32(a)(3),  
1306.32(a)(4), 1306.32(a)(5),  
1306.32(a)(6), 1306.20(g)(1)

**Targeted Questions for Education and Early Childhood Development Services Question 1D**

**Document Review: Class Roster**

- Review class rosters or other supporting documents to determine the number of children enrolled in the class. How many children are enrolled? What is the children's predominate age?

**Observation: Staffing**

- How many children are present in the family child care home? How many providers are hired for the group size? How many children are under age 2? 1306.20(g)(1)

**Education and Early Childhood Development Services Question 1E**

APPLIES ONLY TO: Programs serving infants and toddlers

Does the program ensure that no more than eight children are placed in an infant/toddler room and no more than four children are assigned to each teacher? Does the program ensure that no more than four children are placed in a family child care home?

Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes more stringent than this requirement, the State, local, or Tribal regulations must apply.

1304.52(g)(4), 1306.20(g)(2)

**Targeted Questions for Education and Early Childhood Development Services Question 1E****Observation: Staffing**

- How many children are in infant/toddler rooms? How many children are assigned to each teacher? 1304.52(g)(4)
- How many infants and toddlers are present in the early child care family home? How many children in the group are under 18 months? How many providers are assigned to the group? 1306.20(g)(2)



**Education and Early Childhood Development Services Question 1F**

APPLIES ONLY TO: Programs serving preschool-age children

Does each class have at least two paid staff in the classroom and when possible, a third person who is a volunteer?

1306.20(c), 1306.20(e)

**Targeted Questions for Education and Early Childhood Development Services Question 1F**

**Observation: Staffing**

- Does the program use volunteers in each classroom, when possible?
- How many paid staff do you observe in the classroom?



**Education and Early Childhood Development Services Question 1G**

APPLIES ONLY TO: Programs serving infants and toddlers

Have secure relationships developed between staff and infants and toddlers by having a limited number of consistent teachers over an extended time period?

1304.21(b)(1)(i)

**Targeted Questions for Education and Early Childhood Development Services Question 1G**

**Interview: ECD Manager (Staffing)**

- Have staff changes occurred? How many changes have occurred during this program year?
- What is the procedure for assigning substitutes?

**Interview: Teaching Staff (Human Resources)**

- How do you maintain secure and consistent relationships with infants and toddlers?
- How long has each infant and toddler teacher been with the same group of children?

**Education and Early Childhood Development Services Question 2A**

Does the written curriculum include the required elements?

Note: If the grantee uses a commercial curriculum, consult the Guide to Reviewing Curriculum for a review of that curriculum. If the grantee uses a locally designed curriculum, it will be necessary to review it.

1304.3(a)(5)

**Targeted Questions for Education and Early Childhood Development Services Question 2A****Document Review: Curriculum**

➤ Obtain the name of the curriculum used and describe whether it is consistent with the following criteria:

- Includes goals for children's development and learning;
- Includes experiences through which they will achieve those goals;
- Addresses what staff and parents do to help children achieve those goals;
- Includes materials needed to support implementation;
- Is consistent with the Head Start Program Performance Standards;
- Is based on sound child development principles; and
- Is research based.

**Interview: ECD Manager (Curriculum)**

➤ Does the curriculum include the following:

- Goals for children's development and learning;
- Experiences through which children will achieve those goals; and
- Materials needed to support implementation.

Does the curriculum address what staff and parents do to help children achieve those goals?

➤ What curriculum do you use? Can you describe it? Is it consistent with the Head Start Program Performance Standards, based on sound child development principles, and research based?



**Education and Early Childhood Development Services Question 2B**

APPLIES ONLY TO: Programs serving preschool-age children

Does the program implement a curriculum that supports each child's individual pattern of development and learning?

1304.21(c)(1)(i)

**Targeted Questions for Education and Early Childhood Development Services Question 2B**

**Interview: Teaching Staff (Curriculum)**

- Describe how interactions and activities with individuals and small groups of children are based on each child's developmental level, temperament, learning style, moods, and needs. Examples:
  - Individualize activities based on each child's ability;
  - Plan activities based on assessment of interest to child; and
  - Encourage each child to explore and use materials at his or her developmental level and pace.
- How do you gather information to help you plan activities of interest to each child and support learning?



**Education and Early Childhood Development Services Question 2C**

APPLIES ONLY TO: Programs serving preschool-age children

Does curriculum implementation provide each child with opportunities for success to help develop feelings of competence, self-esteem, and positive attitudes toward learning?

1304.21(c)(1)(vi)

**Targeted Questions for Education and Early Childhood Development Services Question 2C**

**Observation: Curriculum**

- How do teachers encourage children's learning initiatives throughout the day? Describe how teachers listen to children, compliment their accomplishments and efforts, or encourage children to talk about what they are doing.

**Education and Early Childhood Development Services Question 2D**

APPLIES ONLY TO: Programs serving preschool-age children

Are all educational aspects of the health, nutrition, and mental health services integrated into the curriculum?

Note: Cite 1304.21(c)(1)(iii) for compliance with integration of all educational aspects of health, nutrition, and mental health services into program activities.

1304.21(c)(1)(iii),  
1304.22(d)(2), 1304.23(c)(7),  
1304.23(c)(1), 1304.24(a)(2),  
1304.24(a)(3)(i)**Targeted Questions for Education and Early Childhood Development Services Question 2D****Interview: ECD Manager, Home Visitor, Teaching Staff (Staff Coordination)**

- Describe how you coordinate with the mental health services staff. What happens when a teacher or home visitor has a concern about a child? Can you share an example of a referral made this year and its resolution? 1304.24(a)(2)

**Interview: Home Visitor, Teaching Staff (Staff Coordination)**

- Has the mental health professional helped you design practices responsive to behavioral and mental health concerns you have about a child or group of children? If so, can you describe the situation and the process? 1304.24(a)(3)(i)

**Observation: Encouraging Self-Control**

- Are teachers' expectations generally realistic and based on children's age and ability (e.g., sharing not forced although it may be talked about, children not expected to wait for long periods, timeout rarely used and never with children under age 2)?

**Observation: Integrated Curriculum**

- Describe how developmentally appropriate food-related activities are integrated into the curriculum. 1304.23(c)(7)
- Describe how safety awareness is integrated into activities for children. 1304.22(d)(2)

**Observation: Meals**

- Do meals contribute to the development and socialization of all children by providing a variety of food that broadens each child's food experiences? 1304.23(c)(1)





**Education and Early Childhood Development Services Question 2E**

APPLIES ONLY TO: Programs serving preschool-age children

Does the implementation of the curriculum provide individual and small group experiences both indoor and outdoor?

1304.21(c)(1)(vii)

**Targeted Questions for Education and Early Childhood Development Services Question 2E**

**Observation: Curriculum - Implementation**

- Describe opportunities for children to self-select groups.
- Describe the balance of activities, including active and quiet times, large- and small-group activities, indoor and outdoor play times, and child-initiated and teacher-planned activities.
- How do children contribute their own ideas or participate at their own developmental levels during small-group times (e.g., children are asked to classify the nature materials, but may group them in their own ways) and during large-group times (e.g., adults sometimes ask children to add novel words and actions to traditional songs and activities)?

**Education and Early Childhood Development Services Question 2F**

Is the approach to education and child development inclusive of children with disabilities and consistent with their Individualized Family Service Plan (IFSP) or Individualized Education Program (IEP)?

1304.21(a)(1)(ii)

**Targeted Questions for Education and Early Childhood Development Services Question 2F****Interview: Disabilities Staff (Individualization - IFSPs/IEPs)**

- Can you describe how children receive services defined in the IFSP or Individualized Education Program IEP, both from the Head Start program and other agencies?

**Interview: Teaching Staff (Individualization - IFSPs/IEPs)**

- Are you familiar with the requirements of IFSPs/IEPs for children with disabilities?
- Can you describe implementation of IFSP or IEP requirements?

**Interview: Teaching Staff (Learning Children's Needs)**

- What strategies do you use to promote language development in both English and home languages for dual language learners?

**Observation: Individualization - IFSPs/IEPs**

- How are children with disabilities integrated into the group? Do they participate in activities, as appropriate?

**Education and Early Childhood Development Services Question 2G**

Does the program conduct ongoing assessment of each child's functioning in all developmental areas?

1308.6(d)

**Targeted Questions for Education and Early Childhood Development Services Question 2G****Document Review: Child Files**

- Review child files. Are ongoing observations conducted and recorded to better understand each child?
- Review the assessment data in child files.

Does the assessment process collect information about children's functioning in the following areas:

- Gross and fine motor skills;
- Perceptual discrimination;
- Cognition;
- Attention skills;
- Self-help;
- Social and receptive skills; and
- Expressive language?

**Interview: ECD Manager (Assessment Process)**

- What screening tools do you use for children whose home language is not English? Are there limitations to using these tools in either the children's language or in English?

**Interview: ECD Manager (Child Assessments)**

- Does the program use a commercial assessment process, or have you developed your own? Reviewer: Note the name of the commercial tool used, if applicable.
- How are parents included in their children's education?
- How is child assessment information shared with parents?
- How often are child assessments conducted? How is this information used?
- How often do you monitor teacher implementation of your child assessment process?
- If the assessment tool was developed locally, how was it developed and by whom?



#### Education and Early Childhood Development Services Question 2H

APPLIES ONLY TO: Programs serving preschool-age children

Do staff use a variety of strategies to support children's learning and development based on the observations and ongoing assessment of each child?

1304.21(c)(2)

#### Targeted Questions for Education and Early Childhood Development Services Question 2H

##### Interview: ECD Manager (Child Assessments)

- Do you conduct assessments as an integral part of the program to support children's learning? Do you use a variety of methods, such as observations, checklists, rating scales?

##### Interview: Teaching Staff (Child Assessments)

- Are you consistently aware of students who need extra support, assistance, or attention?

##### Observation: Child Assessments

- How do teachers decide what strategies are best for individual children?
- If used, how do different interest areas reflect the use of a variety of learning opportunities based on the teacher's knowledge of children?
- What are the strategies designed to enhance common needs and support learning, development, social skills, literacy and language?



### Education and Early Childhood Development Services Question 3A

Does the program support social and emotional development by building trust so each child can explore the environment according to his or her developmental level?

1304.21(a)(3)(i)(A)

### Targeted Questions for Education and Early Childhood Development Services Question 3A

#### Interview: Teaching Staff (Building Trust)

- Are children oriented to new groups or teachers gradually with a familiar adult present? Describe the process for moving children to new groups. Who is involved when children need to move to new groups?

#### Observation: Building Trust

- Describe how interactions between children are facilitated based on children's interests, developmental level, and needs.
  - How do teachers provide words to children to encourage social interaction?
  - How are children encouraged to share?
  - How are children's feelings acknowledged?

- Describe how interactions with children are pleasant and comforting, showing interest in their activities.
  - What type of voice does the teacher use?
  - Describe the teacher's position when interacting with children.
  - How responsive is the teacher to children when she is needed?

Write a description of a 10 minute teacher interaction with children.

- Describe how teachers help children separate from their parents or guardians (e.g., children are given time and opportunity to separate from their parents; children's feelings about separation are acknowledged).
- Describe relationships between children and adults. Do you see warm and supportive interaction (e.g., frequent positive verbal and physical communication occurs between teachers and children; children seek support from, share their ideas with, and respond freely to teachers)?
- Describe safety problems that might cause injury. Describe times when children were unsupervised.
- Describe the environment and children's ability to explore actively.

**Education and Early Childhood Development Services Question 3B**

Does the program support social and emotional development by fostering independence?

1304.21(a)(3)(i)(B),  
1304.21(a)(1)(v)**Targeted Questions for Education and Early Childhood Development Services Question 3B****Interview: Teaching Staff (Fostering Independence)**

- When developmentally appropriate and supported by parents, how do you encourage independent use of toilet facilities? 1304.21(a)(1)(v)

**Observation: Fostering Independence**

- Are containers and storage shelves accessible to children (e.g., pictures or shapes used as labels on containers and shelves, word labels added for older children)?
- Describe how children's efforts and accomplishments are acknowledged.
- Describe how sufficient time is provided to complete tasks independently (e.g., put on coats, feed themselves, wash hands, brush teeth). Provide additional examples in your notes.
- Describe how the environment and materials are easily accessible.
- How do teachers encourage independence in daily routines (e.g., job chart is visible, children set tables, children serve themselves)?
- How do teachers support problem-solving (e.g., respond calmly to children, help verbalize feelings and actions, ask children to identify solutions)?
- When developmentally appropriate, is independent use of toilet facilities and toilet training encouraged? 1304.21(a)(1)(v)
- Where are materials located in the classroom? Describe the room arrangement and how it encourages children to access materials and gives them clues for how to put things away.

**Education and Early Childhood Development Services Question 3C**

Does the program support social and emotional development that enhances each child's strengths by encouraging self-control through setting clear, consistent limits and having realistic expectations?

1304.21(a)(3)(i)(C)

**Targeted Questions for Education and Early Childhood Development Services Question 3C****Interview: Teaching Staff (Encouraging Self-Control)**

- Do you use timeouts to manage child behavior? How do you determine whether to use timeouts?

**Observation: Encouraging Self-Control**

- Are teachers' expectations generally realistic and based on children's age and ability (e.g., sharing not forced although it may be talked about, children not expected to wait for long periods, timeout rarely used and never with children under age 2)?
- Describe how children are helped to express emotions both verbally and nonverbally.
- Describe how teachers prevent conflict and promote age-appropriate interaction by using effective positive guidance and discipline methods.
- Describe how the teacher prevents problems by using effective positive guidance and discipline methods (e.g., duplicate toys accessible, children not crowded, children prevented from hurting themselves, children stopped from being destructive, consistent response to children's behavior).
- How are classroom rules and expectations for behavior communicated? Are rules and expectations clear and enforced consistently?
- How do teachers monitor the classroom effectively to prevent problems from developing?
- How does staff help children develop appropriate social behavior with peers? Describe situations where children are helped with conflict resolution, encouraged to make friends, or helped to understand other's feelings.



**Education and Early Childhood Development Services Question 3D**

Does the program support social and emotional development by encouraging respect for others' feelings and rights?

1304.21(a)(3)(i)(D)

**Targeted Questions for Education and Early Childhood Development Services Question 3D**

**Observation: Encouraging Respect**

- Are children with disabilities integrated into the group and enabled to participate in activities, as appropriate?
- Describe how teachers engage children in problem-solving strategies and support positive guidance (e.g., acknowledge feelings, verbalize feelings, listen to all sides, anticipate and redirect challenging behavior when needed).
- Describe how teachers support and promote appropriate social interactions (e.g., children prevented from hurting one another, child redirected from negative situation to other activities, child with favorite toy protected from others).
- Describe indications that the teacher and children enjoy warm, supportive relationships with one another (e.g., frequent positive verbal and physical communication between teachers and children).
- How do teachers show respect for children? Describe how teachers listen to children, wait for children to finish their thoughts, and treat children fairly.





**Education and Early Childhood Development Services Question 3E**

Does the program support and respect the home language, culture, and family composition of each child?

1304.21(a)(3)(i)(E)

**Targeted Questions for Education and Early Childhood Development Services Question 3E**

**Observation: Culture/Diversity**

- Describe the languages spoken by children in the classroom and provide examples, when possible, of teachers speaking the language or languages of the children.
- Describe the materials, equipment, and activities seen and whether they reflect the diversity of children and families in the program. Examples:
  - Photographs reflecting their families and cultures;
  - Props and books of different cultures;
  - Dolls of different races; and
  - Posters and books that portray men as fathers and caregivers.
- Does at least one home visitor who interacts regularly with the children speak the same language as the children?
- What types of finger-plays, songs, and games are used in the classroom? Are any from the children's home cultures?



**Education and Early Childhood Development Services Question 3F**

APPLIES ONLY TO: Programs serving infants and toddlers

Does the program support the social and emotional development of infants and toddlers by encouraging the development of self-awareness?

1304.21(b)(2)(i)

**Targeted Questions for Education and Early Childhood Development Services Question 3F**

**Observation: Self-Awareness**

- Describe how easily or quickly teachers respond to individual children.
- Describe how greeting and departure times include an exchange of information with parents on children's daily events.
- Describe how the environment allows children to "see" themselves (e.g., materials brought from home, mirrors accessible, pictures of families displayed).

**Education and Early Childhood Development Services Question 3G**

Does the program support social and emotional development by planning for routines and transitions so they occur in a timely, predictable, and unrushed manner according to each child's needs?

1304.21(a)(3)(ii),  
1304.23(c)(5)

**Targeted Questions for Education and Early Childhood Development Services Question 3G**
**Observation: Bottle Feeding**

- Are infants held during bottle feeding? If not, describe.

**Observation: Daily Routines**

- Are children involved in activities on arrival and kept involved until departure?
- Are daily routines consistent and predictable (e.g., infants and toddlers know that their diapers will be changed; arrivals and departures are consistent, pleasant, and organized; daily routine is posted for adults and children; hand-washing and tooth-brushing are procedures depicted in pictures and words and are posted at children's eye level)?
- Are teachers fully prepared for activities and lessons?
- Describe how daily routines, such as arrival and departure, meals, naps, and diapering, support the children's needs (e.g., teachers patient with messiness, slow eater given plenty of time, infants' faces wiped gently, crib or cot placed in same place, special blanket or cuddly toy made available for toddlers).
- Describe how the daily routine is planned (e.g., materials ready when children arrive, children's belongings ready to go home, diaper changing process consistent, parent and staff chat regularly, transitions minimized).
- In full-day program, how are provisions made for early risers and non-nappers (e.g., early risers permitted to read book or play quietly, separate space and activities used for non-nappers)?
- Is the daily routine flexible and individualized (e.g., infant on individual schedule, tired toddler can have early nap, child soothed by patting back, diapers changed when needed, child fed when hungry)?

**Education and Early Childhood Development Services Question 4A**

Does the program provide for development of each child's cognitive and language skills by supporting his or her learning with various strategies, including experimentation, inquiry, observation, play, and exploration?

1304.21(a)(4)(i)

**Targeted Questions for Education and Early Childhood Development Services Question 4A****Interview: Teaching Staff (Cognitive and Language Development)**

- How do you determine the strategies to develop each child's cognitive and language skills?

**Observation: Cognitive Development**

- Describe opportunities offered to children to participate in age-appropriate science activities.
- Describe the nature of activities and materials available (e.g., placing infants on blankets outdoors, toddlers plant seeds and water plants, care of pets, magnifying glass accessible).
- Describe the variety of daily activities and experiences to extend infants and toddlers' thinking and support their interests.
- Describe the variety of materials and opportunities available for children to explore and play.
- How does the program offer opportunities for dramatic play; for exploration of blocks, sand, and water; and for art, music, and movement?

**Observation: Supplies/Materials**

- Materials rotated regularly

**Education and Early Childhood Development Services Question 4B**

Does the program provide for the development of each child's cognitive and language skills by ensuring opportunities for self-expression through art, music, and movement?

1304.21(a)(4)(ii)

**Targeted Questions for Education and Early Childhood Development Services Question 4B****Interview: Teaching Staff (Self-Expression)**

- How do you engage children in art, music, and movement activities?
- What is your process for rotating materials?
- What opportunities are provided for self-expression?
- What type of music or movement activities are offered? How often are they offered?
- What types of art activities are offered? How often are they offered?

**Observation: Musical Instruments/Materials**

- Describe the variety of musical instrument and materials available.

**Observation: Self-Expression**

- Are a variety of art materials available and accessible?
- What variety of art forms do the children experience?

**Education and Early Childhood Development Services Question 4C**

APPLIES ONLY TO: Programs serving preschool-age children

Does the program promote interaction and language use among children and between children and adults?

1304.21(a)(4)(iii)

**Targeted Questions for Education and Early Childhood Development Services Question 4C****Interview: Teaching Staff (Learning Children's Needs)**

- What strategies do you use to promote language development in both English and home languages for dual language learners?

**Observation: Language Development**

- Describe circle or small group time and opportunities for children to describe and recall activities (i.e., discuss themes such as community helpers, family events, and children's interests).
- Describe how teachers listen actively to students and ask relevant and related questions.
- Describe the frequent conversations between children and teachers that promote opportunities for language use.
- How do teachers balance listening and talking appropriately for children's age and abilities during communication activities (e.g., leave time for children to respond, verbalize for child with limited communication skills)?
- How does the teacher encourage language and social interaction in small groups? Describe the different props used to stimulate language and conversation.
- How does the teacher extend learning through daily conversations? Provide examples of teachers:
  - Asking children open-ended questions that require them to communicate more complex ideas;
  - Introducing and discussing vocabulary words;
  - Using self-talk and parallel talk as a means of expanding children's language; and
  - Using a variety of nouns, verbs, adverbs, adjectives, prepositions, and other forms of language new to the children but that map onto concepts they already understand.

**Education and Early Childhood Development Services Question 4D**

Is each child's literacy and early math development supported through materials and activities according to his or her developmental level?

1304.21(a)(4)(iv)

**Targeted Questions for Education and Early Childhood Development Services Question 4D****Interview: Teaching Staff (Early Math Development)**

- How and when are numbers and operations taught throughout the day?

**Observation: Early Literacy Development**

- Describe activities promoting development of phonological awareness skills.
- Describe how and when developmentally appropriate reading materials are available throughout the day.
- Describe how and when developmentally appropriate writing materials are available throughout day.
- Describe how children interact with the books, the setting in which they are read, and the opportunities for repetition (e.g., seating, teacher focus on the reading activity, toddlers held in teachers' arms, pages turned repeatedly if child asks or shows interest, children interrupt, point, and name pictures).
- Describe how teachers introduce books and read stories with toddlers.
- How are developmentally appropriate reading activities used to promote learning and develop print awareness and concepts?
- How do teachers focus on standard book conventions and directionality (e.g., pages are turned one at a time from front to back; pages are read from left to right, from top to bottom, and from front to back) ?
- How do teachers help children recognize that words are units of print, that letters are grouped to form words, and that words are separated by spaces?
- Provide examples of children retelling and acting out stories and predicting forthcoming events.
- When and how often are books read to children?

**Observation: Early Math Development**

- Describe how numbers and operations are taught throughout the day. How are children taught:
  - Relationships between numbers;
  - Counting accurately; and
  - Counting a group of objects using one-to-one correspondence?
- Describe how numbers are integrated into daily routines and play (e.g., counting steps, counting fingers and toes during diapering, counting toys as they are putting them away).
- Describe how teachers use a variety of experiences and different settings to teach math concepts and build mathematical vocabulary.
- Describe the materials provided for early math. Examples:



#### Targeted Questions for Education and Early Childhood Development Services Question 4D

- Exploring number concepts (e.g., counting objects, number puzzles);
  - Recognizing, copying, creating, and extending patterns (e.g., pattern blocks, colored wooden beads);
  - Exploring geometric shapes and spatial relationships (e.g., shape puzzles, blocks); and
  - Exploring measurement (e.g., measuring cups, balancing scales, rulers, play money).
- How and when are geometry, spatial sense, patterns, and measurement taught throughout the day? How do teachers help children:
- Recognize, describe, compare, and name shapes and their parts and attributes; and
  - Understand directionality, order, position of objects, and words such as up, down, in front, and behind?
- Provide examples of children:
- Matching, sorting, putting in a series, and regrouping objects according to one or two attributes; and
  - Measuring objects.



**Education and Early Childhood Development Services Question 4E**

Does the program's approach to child development and education provide balanced daily opportunities for child-initiated and adult-directed activities, including individual and small-group activities?

1304.21(a)(1)(iv)

**Targeted Questions for Education and Early Childhood Development Services Question 4E****Observation: Daily Routines**

- Describe how children engage in both active (e.g., outdoor, climbing, dancing) and quiet activities (e.g., reading, painting, puzzles, play dough) throughout the day.
- Describe how the daily routine offers opportunities for children to engage in child-initiated activities (e.g., free choice-time, asking teacher to read a book, teacher engaging in child-initiated conversation, teacher following child's lead, teacher responding to infants' verbal cues).
- Describe how the daily routine offers opportunities for infants and toddlers to engage in playful interactive activities that are teacher directed (e.g., teacher reads to child or group of children, teacher leads children in a group activity).
- How do teachers organize time (e.g., part of daily schedule) and space (e.g., open areas, cozy areas) daily for children to play individually, in pairs, and in small groups?
- How do the teachers use small groups and circle time to increase the amount of conversation and to involve all learners?
- Is time and space organized daily for infants and toddlers to play individually, in pairs, and in small groups? Examples:
  - Story read to an individual child, including stories that are culturally familiar;
  - Small group helped with a science activity; and
  - Soft cozy area set aside for children.

**Education and Early Childhood Development Services Question 5A**

APPLIES ONLY TO: Center-based programs

Is physical development promoted by providing sufficient indoor and outdoor space, equipment, materials, and adult guidance for active play and movement?

1304.21(a)(5)(i),  
1304.21(b)(3)(i)

**Targeted Questions for Education and Early Childhood Development Services Question 5A**
**Interview: Teaching Staff (Gross Motor Skills)**

- Do children go outside year round, weather conditions permitting?

**Observation: Gross Motor Skills**

- Describe available materials and equipment that encourage grasping, pulling, pushing, crawling, walking and climbing. 1304.21(b)(3)(i)
- Describe how teachers participate actively with children (e.g., play with infants and toddlers on the carpet indoors or on a blanket outdoors, sit with a child on a swing, run and play ball with toddlers).
- Describe how the indoor space and equipment supports active physical play (e.g., young infants can move freely on the carpet, children can crawl and walk around, play area is not crowded or cluttered).
- Describe the outdoor equipment and materials available for various types of play (e.g., riding toy, climber, playhouse, balls, chalk). Do the outdoor equipment and materials encourage active play and movement?
- Describe the outdoor space. Is there a variety of surfaces permitting different types of play (e.g., sand, asphalt or composite firm enough for riding toys, grass)?
- Describe the space available for gross motor play.
- How do teachers help children develop skills needed to use equipment (e.g., pump on swing, use adaptive pedals on tricycle (child with disabilities), teacher support for climbing and balancing)?
- How is the gross motor equipment appropriate for different developmental levels (e.g., fixed equipment size for preschoolers, tricycles with and without pedals, balls of different sizes, both ramp and ladder access to climbing structure)?

**Observation: Indoor/Outdoor Space**

- If space used by mobile infants, or toddlers is not separated from general walkways and areas used by preschoolers, describe it.

**Education and Early Childhood Development Services Question 5B**

Does the program provide appropriate time, space, equipment, materials, and adult guidance for developing fine motor skills according to each child's developmental level?

1304.21(a)(5)(ii),  
1304.21(b)(1)(iii)

**Targeted Questions for Education and Early Childhood Development Services Question 5B****Observation: Fine Motor Skills**

- Describe how materials are accessible and easy to put away (e.g., pegs and pegboards stored together, building toy sets stored separately, low shelves, baskets, tabs).
- List materials with different levels of difficulty that are available during the day (e.g., 4-, 7-, and 11-piece puzzles for children with varying fine motor skills, large-piece and knobbed puzzles, nesting cups, textured material, large stringing beads, varying-size pegs and pegboards, blocks and dramatic play props of different sizes, such as toy people and animals).
- List the daily activities that encourage control and coordination of small, specialized motions of eyes, mouth, hands, and feet (e.g., art activities, sand and water play, blocks building, feeding, washing hands). 1304.21(b)(1)(iii)
- List the variety of activities throughout the day (e.g., art activities, sand and water play, blocks building, shape sorting, feeding).

**Observation: Meals**

- Describe how staff implements family-style meals. For example:
  - Is conversation shared during the meal?
  - If the grantee serves prepackaged food, are teachers still sitting with the children during meals and snacks?
  - Do other designated staff or volunteers eat and converse with the children during meals if teachers are unable to have their meals at the same time as children?
  - Do teachers use mealtime as an opportunity to model language, conversation, and social interaction and to introduce nutritious foods?

**Education and Early Childhood Development Services Question 5C**

APPLIES ONLY TO: Home-based programs

Are parents encouraged to appreciate the importance of physical development, provide opportunities for children's outdoor and indoor active play, and guide children in the safe use of equipment and materials?

1304.21(a)(6),  
1304.21(b)(3)(i),  
1304.21(b)(3)(ii)

**Targeted Questions for Education and Early Childhood Development Services Question 5C**
**Interview: Home Visitor (Fine Motor Skills)**

- How do you help parents support their child's fine motor skills? Examples:
  - Art activities, especially drawing, painting, and clay modeling;
  - Sand and water play;
  - Eating with utensils; and
  - Playing with puzzles.

**Interview: Home Visitor (Gross Motor Skills)**

- How do you encourage families to participate actively with their children (e.g., tumble with child on the carpet indoors or on a blanket outdoors, sit with child on a swing, ride or walk with child on bike, wagon, other wheeled toy)?
- What materials and equipment do you provide to families for physical activity that encourage pulling, pushing, walking, running, balancing, and climbing?

**Observation: Fine Motor Skills**

- How do home visitors help parents support their child's control and coordination of small, specialized motions, using the eyes, mouth, hands, and feet (e.g., art activities, sand and water play, blocks building, feeding, washing hands)? 1304.21(b)(3)(ii)
- How do home visitors help parents support their child's fine motor skills? Examples:
  - Art activities, especially drawing, painting, clay modeling;
  - Sand and water play;
  - Eating with utensils; and
  - Playing with Puzzles.

**Observation: Gross Motor Skills**

- Do home visitors provide ample materials and equipment to families for physical activity that encourage grasping, pulling, pushing, crawling, walking, and climbing?
- How do home visitors encourage families to participate actively with their children? Examples:
  - Play with their child on the carpet indoors or on a blanket outdoors;
  - Tumble with their preschooler on the carpet indoors or on a blanket outdoors;
  - Run and play ball with their toddlers;



**Targeted Questions for Education and Early Childhood Development Services Question 5C**

- Sit with their child on a swing; and
  - Ride or walk with their child on a bike, in a wagon, or on other wheeled toys.
- What materials and equipment do home visitors provide to families for physical activity that encourage pulling, pushing, walking, running, balancing, and climbing?



#### Education and Early Childhood Development Services Question 6A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of education and early childhood development services at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Education and Early Childhood Development Services Question 6A

##### Document Review: Ongoing Monitoring Documents and Tools

- Use ongoing monitoring documentation or tools to verify the process for the program's ongoing monitoring of its education and early childhood development services as described through your interviews with the ECD Manager and teaching staff.

##### Interview: ECD Manager (Ongoing Monitoring)

- How do you monitor delivery of the program's education and early childhood development services and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's education and early childhood development services? What is the process for reporting and documenting problems identified in the education and early childhood development services area? Who reports such information and to whom is it reported? How and where is it documented, if at all?



## Fiscal Management

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Fiscal Management section of the Protocol is divided into five subsections:

*Section 1: Governance and Internal Controls*

*Section 2: Use of Head Start Grant Funds*

*Section 3: Grant Property*

*Section 4: Compensation*

*Section 5: Financial Reporting*



### Fiscal Management Question 1A

Has the program's governing body established and implemented strong, appropriate internal controls to safeguard Federal funds?

1304.50(g)(2), 74.21(b)(3),  
92.20(b)(3)

### Targeted Questions for Fiscal Management Question 1A

#### Document Review: Accounting Policies and Procedures

- Do the policies and procedures describe appropriate internal controls?

#### Document Review: Audits

- Is there an audit footnote disclosure of delegation of fiscal or governance responsibilities to another entity?
- Review the last three audit reports and audit management letters.

Are there audit findings or management letter comments related to the Head Start (HS) program? Are these findings or comments inconsistent with appropriate internal controls?

Did the auditor place qualifications on the audit opinion? Are the qualifications related to a lack of appropriate internal controls?

#### Document Review: Governing Body Meeting Minutes

- Do meeting minutes provide evidence that the Governing Board (the Board) approved the audit report and management letter and that the Board was involved in developing an appropriate response to audit findings and concerns?
- Do minutes provide evidence the governing body received and reviewed audit reports?  
Do minutes provide evidence the governing body was informed of instances of noncompliance detected through audits or other compliance reviews?  
Do minutes provide evidence the governing body directed correction of known instances of noncompliance?

#### Document Review: SF-269 Financial Reports

- Is the SF-269 signed by an official of another entity?

#### Document Review: SF-424

- Is the SF-424 grant application signed by an official of another entity?

#### Interview: Financial Officer (Audit Findings)

- Did the governing body develop a corrective action plan and direct its implementation?
- Did the most recent audit report include findings?

#### Interview: Financial Officer (Control Activities)

- Does the program:
  - Perform periodic cost projections to ensure that funds will be adequate to carry out the Head Start program as described in the approved funding application;
  - Count physical assets periodically, comparing them to inventory records; and
  - Segregate duties among individuals responsible for authorizing transactions, processing transactions, and reconciling fiscal accounts?





#### Targeted Questions for Fiscal Management Question 1A

##### Interview: Financial Officer (Internal Controls)

- Does the governing body approve loans and contracts over a specified material amount?
- How do you detect errors, fraud, misuse, or unauthorized alteration involving Head Start financial transactions and events?
- What, if anything, does the governing body do to impose clear spending limits?

##### Interview: Financial Officer, Governing Body Members (Internal Controls)

- Are the Executive Director and governing body notified if actual expenses exceed the budgeted amount?

##### Interview: Governing Body Members (Internal Controls)

- Do governing body members periodically receive and review bank statements or summaries reflecting financial activity in the Head Start program?
- What does the governing body do to promote accountability over cash and other assets to ensure that accounting data is accurate?

##### Interview: Governing Body Members (Ongoing Monitoring)

- Do you receive periodic financial information related to purchases, leases, vendor payments, etc. that allows you to determine that Head Start resources are being used for authorized purposes?

##### Interview: Governing Body Members (Self-Assessment)

- How are you involved in the annual Self-Assessment of the fiscal management system's effectiveness and progress in ensuring that strong fiscal controls are maintained to meet program objectives and Federal requirements?

##### Interview: Governing Body Members, Head Start Director (Internal Controls)

- Who assumes responsibility for determining that charges to Head Start are allowable, allocable, and reasonable?

### Fiscal Management Question 1B

APPLIES ONLY TO: Grantees

Do the program's governing body members meet the conflict of interest requirements?

Note: Are governing body members, and members of their immediate families, free of financial or other conflict of interest, including ensuring that they:

- Are not employees, or members of their immediate families are not employees, of the program, or related to employees, and not vendors to the grantee or delegate;
- Have no financial conflict of interest with the grantee (including a delegate agency);
- Receive no compensation for serving on the governing body or for providing services to the grantee; and
- Operate as an entity independent of staff employed by the grantee (e.g., are not influenced by the staff of the grantee).

642(c)(1)(C)(i), 642(c)(1)(C)(ii),  
642(c)(1)(C)(iii),  
642(c)(1)(C)(iv),  
642(c)(1)(E)(iv)(X)(aa)

### Targeted Questions for Fiscal Management Question 1B

#### Interview: Financial Officer, Governing Body Members (Conflict of Interest)

- Does the grantee have a policy with respect to its officers and key employees prohibiting direct or indirect ownership or profit participation in outside business enterprises with which the Agency does business?

#### Interview: Governing Body Members (Conflict of Interest)

- Are you aware of any vendor of goods or services in which a governing body member has a financial interest? 642(c)(1)(C)(iv)  
(Note: Exceptions shall be made if an individual holds a position as a result of public election or political appointment, and such position carries with it a concurrent appointment to serve as a member of a Head Start agency governing body, and such individual has any conflict of interest as described above, such individual shall not be prohibited from serving on such body and the Head Start agency shall report such conflict to the Secretary, and if the position held as a result of public election or political appointment provides compensation, such individual shall not be prohibited from receiving such compensation.)
- Are you, or is any member of your immediate family, an employee of the grantee or delegate or related to employees of the grantee or delegate? 642(c)(1)(C)(iii)
- Do members receive compensation (other than reimbursement of out-of-pocket costs) for serving on the governing body or for providing goods and services to the organization? 642(c)(1)(C)(ii)
- What written procedures and standards have been established for disclosing, addressing, and resolving conflicts of interest? Can you show me these written procedures? How does the board implement its policies to determine board members have a conflict of interest? 642(c)(1)(E)(iv)(X)(aa), 642(c)(1)(C)(i)

**Fiscal Management Question 1C**

APPLIES ONLY TO: Grantees

Does the program's governing body have at least one member with a background and expertise in fiscal management or accounting unless the lack of availability has been documented?

Note: Exceptions shall be made to the requirements of clauses (i) to (iv) for members of a governing body when those member oversee a public entity and are selected to their positions with the public entity by public election or political appointment.

If a Head Start agency is unable to include members with a background or expertise in fiscal management or accounting, the governing body must obtain the services of a consultant or other individual with the required background and expertise to work with the governing body instead.

American Indian and Alaska Native grantees fall under this exclusion.

642(c)(1)(B)(i), 642(c)(1)(B)(vi)  
Link: PDM1A

**Targeted Questions for Fiscal Management Question 1C****Interview: Governing Body Members (Composition)**

- Can you show me a resume or other supporting documentation that demonstrates at least one board member or consultant has financial expertise. 642(c)(1)(B)(i)
  - Does a member of the governing body have fiscal background and the ability to understand audit reports, balance sheets, ledgers, and Federal fiscal grant requirements? 642(c)(1)(B)(i)
  - Does the grantee fall under the exceptions in the Head Start Act, because the Board oversees a public entity and members are selected to their positions by public election or political appointment? 642(c)(1)(B)(vi)
  - If no person with fiscal expertise is available to serve as a member of the governing body, does the governing body use a consultant or another individual with relevant expertise who works directly with the governing body? 642(c)(1)(B)(vi)
- (Note: If a consultant is used, ask "How did you document the lack of a governing body member with fiscal expertise?" Share documentation.)

**Fiscal Management Question 1D**

Has the program's governing body delegated by contract, or other arrangement, governance or fiscal responsibilities for the Head Start grant to an entity unrelated to the local grantee?

1301.13(b)

**Targeted Questions for Fiscal Management Question 1D****Document Review: Contracts, Payments, and Reimbursements**

- Do contracts show the grantee governing body has delegated fiscal or governance responsibilities to another entity?

**Document Review: Governing Body By-Laws**

- Do by-laws provide evidence the grantee governing body has delegated fiscal or governance responsibilities to another entity?

**Interview: Governing Body Members (Delegated Responsibilities)**

- Are Head Start funds used to compensate the entity with delegated responsibilities for fiscal or governance functions?
- Has the grantee governing body delegated fiscal or governance responsibilities to another entity? If so, can you share copies of contracts or other agreements specifying reciprocal obligations?  
Retain copies.
- Which entity has the legal authority to obligate Head Start funds? Can you show me how the grantee retains authority over the obligation of Head Start grant funds?



#### Fiscal Management Question 1E

Has the program secured the regularly scheduled or ongoing services of a qualified fiscal officer?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

Note: This question relates to the "control environment" aspect of internal controls. A positive control environment is the foundation for all other standards. It provides discipline and structure as well as the climate that influences the quality of internal control. Several key factors, such as qualified staff and codes of conduct, affect the control environment. (Government Accountability Office [GAO])

1304.52(d)(8)  
Link: PDM7B

#### Targeted Questions for Fiscal Management Question 1E

##### Interview: Financial Officer (Control Environment)

- Can you describe the grantee and delegate's accounting system? Listen for whether he or she understands the accounting system and procedures.
- Has the grantee or delegate been without the services of a fiscal officer or 30 days or longer during the last 2 years?
- What percentage of time do you spend on Head Start?
- What regular financial reports reflecting Head Start financial activity do you prepare?
- Who plans, directs, and coordinates Head Start business and financial operations?



#### Fiscal Management Question 1F

Does the program have a written code or standards of conduct governing the performance of its employees engaged in awarding and administering contracts?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);

45 CFR Part 92 for State, local, and Tribal governments.

Note: This question also relates to the "control environment" aspect of internal controls.

74.42, 92.36(b)(3)  
Link: PDM1D

#### Targeted Questions for Fiscal Management Question 1F

##### Document Review: Code of Conduct

- Does the organization maintain a code of conduct meeting the requirements of either 74.42 or 92.36(b)(3)? The code of conduct might exist as a separate document or within the personnel policies of an employee handbook.

##### Interview: Financial Officer (Code of Conduct)

- Does a code of conduct exist? Does it include guidance on acceptable practices and conflicts of interest?

**Fiscal Management Question 1G**

Do content area experts assigned to oversee fiscal management have training related to accounting or demonstrated experience in fiscal matters?

1304.52(d)(8)

**Targeted Questions for Fiscal Management Question 1G****Document Review: Staff Files**

- Prior to conducting your interviews, review the job description for the content area expert who oversees fiscal management services.  
  
Does the fiscal officer position require a Certified Public Accountant (CPA), a bachelor's or master's degree in accounting, and/or demonstrated expertise in fiscal matters, such as the ability to:
  - Develop, monitor, evaluate, and report on financial control programs and procedures, including compensation and benefits, to policy groups and staff;
  - Develop and maintain accurate charts of accounts, including allocating program income and outlays and in-kind contributions;
  - Initiate and direct, in coordination with other staff and parents, cost studies and comparative analyses of alternative operating strategies; and
  - Help resolve audit exceptions, implement, make recommendations, and report all findings to management staff and governing bodies?
- Review the personnel file, contract, or resume of the fiscal management expert for documentation of training and experience in accounting and fiscal matters. List the training, experience and qualifications documented. Does the fiscal management expert have the required qualifications?

**Interview: Financial Officer (Staffing)**

- Describe how hired staff or consultants provide regularly scheduled and ongoing fiscal expertise and oversight.
- What experience in managing a public or private organization do you?
- What training and experience do you have related to accounting and fiscal matters?

**Interview: Head Start Director (Staffing)**

- How and by whom were the financial officer's personnel and employment record and references verified?

**Fiscal Management Question 1H**

Do the program's financial management systems provide for effective control over and accountability for grant funds, property, and other assets and ensure they are used solely for authorized purposes?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

Note: This question relates to the "control activities" aspect of internal controls. Control activities are the policies, procedures, techniques, and mechanisms that enforce management's directives, such as the process of adhering to requirements for budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, reviewing, and accountability for stewardship of government resources and achieving effective results. (GAO)

74.21(b)(3), 92.20(b)(3),  
74.21(b)(4), 92.20(b)(4)  
Link: FIS1A

**Targeted Questions for Fiscal Management Question 1H****Document Review: Accounting Policies and Procedures**

- Do the policies and procedures describe a system that, if properly implemented, will result in effective internal controls?

**Document Review: Audits**

- Are the audit management letter comments inconsistent with effective internal controls?
- Do the audit reports communicate (through the opinion, footnote disclosure, or audit findings) conditions inconsistent with effective internal controls?
- Has the grantee addressed these findings or comments in a corrective action plan?  
Does the plan (or other relevant document) show evidence the plan has been implemented?

**Document Review: Bank Reconciliations & General Ledger**

- Select a small sample of bank statements.
  - Are bank statements reconciled to the general ledger?
  - Are reconciling items (including outstanding checks) resolved within a reasonable time frame?
  - Do checks clear the bank within a reasonable amount of time after the issue date?
  - Are the signatures on cancelled checks those of individuals who the Board has authorized as signers?
- Select a small sample of journal entries from the general ledger. Are journal entries supported by appropriate documentation and approved by a person other than the preparer?

**Document Review: Physical Controls**

- In conducting the review, were problems noted in physical control, such as open access to check stock or purchase orders, cash not under lock and key, or open access to mechanical check signers or signature stamps?

**Interview: Financial Officer (Control Activities)**

- Are forms such as blank checks and purchase orders pre-numbered sequentially and physically secure? Is access to them limited?
- Are identification plates and numbers affixed to office furniture and fixtures, equipment, and other portable assets? If not, how are physical assets safeguarded?





#### Targeted Questions for Fiscal Management Question 1H

- Are journal entry duties segregated so one person does not prepare and post journal entries without a qualified person's review and approval?
- Are mechanical check signers and signature plates physically protected? Is access to them strictly controlled?
- Are provisions in place for reconstructing data files in case of catastrophe?
- Are spending limits established? Is documentation required for credit card use?
- Do grantee and delegate accounting systems provide audit trails that permit the tracing of transactions back to original source documents? 74.21(b)(4)
- Do programs with limited staff establish procedures to compensate for the lack of segregation of duties, such as:
  - Management review of reports on detailed transactions, including selection of transactions to review supporting documents; and
  - Independent reconciliations or review of reconciliations of account balances?
- Does the program have procedures for use of automated check signers and signature plates to restrict access and to ensure that check "signing" is done by a person authorized appropriately and uninvolved in either recording of transactions or preparing and distributing checks?
- Does the program:
  - Perform periodic cost projections to ensure that funds will be adequate to carry out the Head Start program as described in the approved funding application;
  - Count physical assets periodically, comparing them to inventory records; and
  - Segregate duties among individuals responsible for authorizing transactions, processing transactions, and reconciling fiscal accounts?
- How often are actual Head Start costs compared with budgeted costs? 74.21(b)(4), 92.20(b)(4)
- Is cash under lock and key? Is access strictly controlled?
- Were end-of-year "bonuses" paid that were unscheduled or failed to conform to established grantee and delegate policies? If so, cite appropriate standard, depending on type of grantee.



#### Fiscal Management Question 11

Has the program conducted an annual audit in accordance with OMB Circular A-133?

Note: This question also relates to the "control activities" aspect of internal controls.

A-133(200)(a), A-133(400)(d)(4)

#### Targeted Questions for Fiscal Management Question 11

##### Document Review: Audits

- Review the last 3 years' audits. Do audits include the compliance reporting required by A-133?

##### Document Review: Contracts, Payments, and Reimbursements

- Review any contract with the auditor for additional services outside the audit. Does the contract call for the auditor to provide non-audit services that involve performing management functions, making management decisions, or requiring the auditor to audit his own work? (If so, follow-up with an interview with the auditor to understand how independence is maintained.)

##### Interview: Financial Officer (Control Activities)

- Did the organization expend \$500,000 or more in a year in Federal awards? If so, can you furnish evidence of A-133 audits for the last 3 years?
- Has the independent auditor performed services for the grantee other than auditing the grantee and delegate's financial statements?
- If additional services are performed by the firm that conducts the annual audit, how has the auditor maintained independence?



### Fiscal Management Question 2A

Has the program implemented procedures to determine allowability, allocability, and reasonableness of costs as required?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);

45 CFR Part 92 for State, local, and Tribal governments

FOR NONPROFIT ORGANIZATIONS ONLY: Verify that the grantee and delegate have written procedures for determining the allowability, allocability, and reasonableness of costs in accord with 2 CFR Part 230 and 74.21(b)(6).

Note: This question also relates to the "control environment" aspect of internal controls.

74.21(b)(6), 92.20(b)(5),  
74.28, 92.23(a)

### Targeted Questions for Fiscal Management Question 2A

#### Document Review: Bank Reconciliations & General Ledger

- Review detailed general ledger or payables journal.

Based on review of the general ledger or payables journal, select a sample of transactions, including high dollar amount, vendors frequently used by the organization, unusual items, and credit card transactions, and review source documents.

Document the number of transactions reviewed and the number of exceptions noted (Provide details on exceptions, and confirm exceptions by interviewing the financial officer.)

Do the costs appear to be necessary and reasonable for operation of the Head Start program?

Were the costs not specifically disallowed under the cost principles?

Was the cost allocated to Head Start in proportion to the benefit received (as documented by the organization's cost allocation plan or other means)?

Did documentation of receipt or acceptance by the program exist before the invoice was processed for payment?

Was the cost supported by a contract (if appropriate)?

Was the invoice adequately descriptive to support the allowability of the cost?

For credit card transactions, was the transaction consistent with the organization's credit card policies?

Have prior year salaries or other prior year costs been charged to the current budget year?

- Select a small sample of credit card payments from the general ledger. Does the grantee maintain supporting documentation with adequate description to support the allowability and allocability of the charge? Are purchases approved by a person other than the orderer? Is credit card use consistent with the organization's written policy?

#### Interview: Financial Officer (Allowable Costs)

- At what point within the obligation and payment process is the determination made regarding the allowability, allocability, and reasonableness of costs?
- Does the organization have procedures for determining the allowability, allocability, and reasonableness of costs in accordance with the applicable cost principles? Procedures must be written for nonprofit organizations.
- Is a responsible member of management required to review and approve all charges before obligation or payment to ensure allowability, allocability, and reasonableness?
- What happens if you determine that costs were not unreasonable or unallowable after the fact? Does a process exist for correcting errors?
- Who assumes responsibility for determining the allowability, allocability, and reasonableness of program charges?

**Fiscal Management Question 2B**

APPLIES ONLY TO: Programs having shared costs with other programs

If the program has shared costs with other programs, have they used an allocation base that best measures the relative degree of benefit for all benefiting functions?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App A(A)(4)(a)(2), 225, App A(C)(3)(a), 220, App A(C)(4)(a)

**Targeted Questions for Fiscal Management Question 2B****Document Review: Administrative Costs**

- Does the organizational chart reflect multiple programs?

**Document Review: Allocated Costs**

- Does the organization maintain documentation to support that an acceptable after-the-fact methodology is used to allocate costs (e.g., number of children served, number of actual employees, amount of square footage)?

Are occupancy costs allocated based on the proportion of usable space occupied by each program?

**Document Review: Audits**

- Does the audit report reflect multiple programs? Does the report show any program subsidizing another?

**Document Review: Cost Allocation Plan**

- Do the methods shown in the allocation procedures or plan ensure each program is paying only its share of the cost of resources used in common?

**Document Review: Grant Application Budget Instrument (GABI)**

- If the shared costs are part of a partnership, does the approved grant application (GABI) contain a partnership agreement and budget?

**Document Review: Indirect Costs**

- Does the organization have an indirect rate?

**Document Review: Salaries & Payroll**

- Select a small sample of payroll transactions. If shared staff charge their time directly to each program, do properly prepared and signed time sheets and personnel activity records exist?

**Interview: Financial Officer (Shared Costs)**

- What is the process for updating the allocation procedures or plan?
- Who determines the reasonableness of the allocated costs for the grantee when costs are shared?

**Fiscal Management Question 2C**

APPLIES ONLY TO: Grantees that charge indirect costs

If the grantee charges indirect costs, are those costs supported by a current negotiated indirect cost rate?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App A(E)(2)(c), 230, App A(E)(2)(d), 230, App A(E)(2)(e), 230, App A(E)(2)(f), 230, App A(E)(2)(g), 225, App A(H), 220, App A(G)(11)(g)

**Targeted Questions for Fiscal Management Question 2C****Document Review: Financial Reports**

- Do recent Head Start financial reports show indirect costs charged to the award?

**Document Review: SF-269 Financial Reports**

- Review the most recent final SF-269 report. Does the SF-269 report show indirect costs charged to the award? Are the indirect costs charged to Head Start included in the grantee's development and administrative cost for the period?  
Does the grantee submit a final accounting of indirect costs to the Division of Cost Allocation after year end (if required by the indirect rate agreement)?
- How does the organization ensure that positions charged to the indirect cost pool are consistent with the approved agreement?
- How does the organization exclude indirect costs that are either unallowable or excluded per the rate agreement?
- Is the indirect rate agreement current? What is the approved rate? What is the base on which indirect costs are applied?
- What controls does the organization have to prevent costs from being charged to both the indirect cost pool and the direct award?



### Fiscal Management Question 2D

Does the program have procedures for minimizing the time elapsing between the advances of funds from the Payment Management System and disbursement of those funds? Have Head Start funds been drawn down in excess of documented cash requirements?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 9 for State, local, and Tribal governments.

Note: For nonprofit organizations, procedures must be written. For State, local, and Tribal government entities, procedures need not be written.

74.21(b)(5), 74.22(b)(2),  
92.20(b)(7)

### Targeted Questions for Fiscal Management Question 2D

#### Document Review: Accounting Policies and Procedures

- Do the grantee and delegate have written procedures for minimizing the time elapsing between the drawdown of funds from the Payment Management System and disbursement of those funds?
- Do the written procedures call for periodic reconciliation of cumulative drawdown to disbursements?
- Do the written procedures specify how often the grantee will drawdown funds?

#### Document Review: Audits

- Do audits show programs operating at a deficit?

#### Document Review: Bank Reconciliations & General Ledger

- Do the balance sheets show a significant balance of Federal cash?
- Do the reconciled bank statements show a significant balance of Federal cash?

#### Document Review: PSC-272

- Do the reports reflect significant Federal cash balance? (If so, follow up with an interview of fiscal officer.)
- Review the following:
  - PSC-272 Federal Cash Transactions Report (PSC-272 report) (and supporting documentation) for the four most recent quarters;
  - General ledger for corresponding period; and
  - Bank statements.

Select a sample of drawdowns from the PSC-272 report.

Verify that the grantee has appropriate documentation of pending (or actual) disbursements to support the requested amount.

Trace a subsample of disbursements to bank statements to determine the amount of time elapsed between request and disbursement.

Review supporting documentation to establish that the disbursements reported on the PSC-272 report have been reconciled to the general ledger.

Based on the sample, does the grantee disburse Federal cash immediately?

Are cash requests supported by appropriate documentation?

Are the disbursements reported on the PSC-272 report reconciled to the general ledger?



#### Targeted Questions for Fiscal Management Question 2D

##### Interview: Financial Officer (Drawdowns)

- Can you describe the process by which the time between the drawdown of grant funds and disbursement is minimized?
- Do grantee and delegate processes allow for adjustment of subsequent cash requests when previous disbursements have been overestimated?
- Do you reconcile Head Start disbursements recorded in the financial system to Head Start disbursements reported on the PSC-272 report? What controls exist to prevent the temporary use of Head Start funds for other than authorized purposes?

**Fiscal Management Question 2E**

Have program funds been used to cover costs normally paid by other funding streams (i.e., inter-fund borrowing)?

230, App A(A)(2)(a), 225, App A(C)(1)(a), 225, App A(C)(1)(d), 220, App A(C)(2)

**Targeted Questions for Fiscal Management Question 2E****Document Review: Accounting Policies and Procedures**

- Do the grantee and delegate have a policy prohibiting use of Head Start funds to cover the costs of other funding streams?

**Document Review: Audits**

- Do audit reports reflect inter-fund balances on the balance sheet or include a finding that Head Start cash has been used for unauthorized purposes?

**Document Review: Bank Reconciliations & General Ledger**

- Do inter-fund ("due to" or "due from") balances appear on the balance sheet?
- Scan the general ledger, payroll journal, and adjusting journal entries. Is there any indication the award has been charged for costs not related to Head Start?

**Document Review: PSC-272**

- Do drawdowns indicate a pattern of accelerated or delayed expenditures?

**Interview: Financial Officer (Inter-fund Borrowing)**

- Does the organization have one or more of the following: programs operating at a deficit, loss of programs, or delayed reimbursement in other programs?
- What controls exist to prevent temporary use of Head Start funds for other than authorized purposes?



**Fiscal Management Question 2F**

APPLIES ONLY TO: Grantees

Did the grantee comply with the limitation on development and administrative costs?

Note: The limit on costs for developing and administering an Head Start program is no more than 15 percent of the total grant unless the Regional Office has required a lesser percentage of the grantee.

1301.32(a)(1), 1301.32(a)(2),  
1301.32(b)(2), 1301.32(d)

**Targeted Questions for Fiscal Management Question 2F****Document Review: Administrative Costs**

- Review the organization chart and job descriptions. Select a small sample of positions from the organization chart. Review the percentage of the salary for the position identified as administrative. Review the job description for administrative functions.

Did the grantee identify the administrative portion of personnel costs reasonably?

**Document Review: Audits**

- Do audit reports reflect findings related to the administrative cost limitation?

**Document Review: Grant Application Budget Instrument (GABI)**

- Does the grant application show a reasonable effort at identifying the administrative portion of all costs?
- If the organization has not categorized all indirect costs as administrative costs, does the proposal support the organization's claim that a portion of indirect costs were other than administrative in nature?

**Document Review: SF-269 Financial Reports**

- Review the final SF-269 report for the award period completed most recently.  
  
Verify that the grantee has included indirect cost and the administrative portion of non-Federal share in its accounting of administrative costs.  
  
Were the grantee's administrative costs not in excess of 15 percent of total approved costs? (Approved costs equal total Federal share plus non-Federal share up to the amount approved in the Financial Assistance Award [FAA].)  
  
Based on the procedures described above, did the grantee's SF-269 report properly reflect administrative costs, including all:
  - Development costs;
  - Indirect costs and organization-wide management functions 1301.32(b)(2);
  - Dual benefit costs 1301.32(d);
  - Non-Federal development and administrative costs;
  - Delegate agencies development and administrative costs; and
  - Other administrative costs?

**Interview: Financial Officer (Development and Administrative Costs)**

- How does the organization identify the administrative portion of dual-benefit costs?
- What is the process for identifying, tracking, and including all administrative compensation in the total development and administrative expenses?

**Fiscal Management Question 2G**

APPLIES ONLY TO: Grantees

Did the grantee's reported use of Federal funds in its last budget exceed 80 percent of the total cost without a written waiver?

1301.20(a)(1)

**Targeted Questions for Fiscal Management Question 2G****Document Review: Financial Assistance Award (FAA)**

- Review the last Financial Assistance Award (FAA) for the most recently completed award period. What was the required non-Federal share percentage and amount on the FAA?

**Document Review: Non-Federal Share**

- Review the supporting schedule for non-Federal share reported on the SF-269 for the most recently completed award period.

Is the total amount on the grantee's supporting schedule at least as much as the amount reported on the SF-269?

**Document Review: SF-269 Financial Reports**

- Review the SF-269 report for the most recently completed award period. Compute the non-Federal share percentage: Non-Federal share divided by the total of the Federal share plus the non-Federal share (up to amount approved on the FAA).

Did the grantee's non-Federal share percentage meet or exceed the percentage specified in the FAA?

**Interview: Financial Officer (Non-Federal Share)**

- Did the grantee request a waiver of non-Federal share?

Reviewer should collect available documents to establish who was asked, the request date, and the response.

**Fiscal Management Question 2H**

Does the program have a procedure for valuation of its claimed non-Federal match through third-party contributions of volunteer services, goods, supplies, donated land, buildings, or space? Is grantee and delegate claimed non-Federal participation verifiable from documentary records?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

Note: Cite 92.24(c) (1) for State, local, and Tribal governments if an employer other than a grantee, sub-grantee, or cost-type contractor furnishes employee services free of charge. For nonprofit organizations and educational institutions (universities and colleges), cite 74.23(h) (1) for land and buildings, and cite 74.23(h) (3) for donated space.

74.23(a)(1), 74.23(d),  
74.23(h)(2), 74.23(i)(1),  
74.23(i)(2), 92.24(c)(1),  
92.24(b)(6), 92.24(d),  
74.23(h)(1), 74.23(h)(3),  
92.24(g)

**Targeted Questions for Fiscal Management Question 2H****Document Review: Accounting Policies and Procedures**

- Does the program have a written procedure to guide staff in assigning values to donated services, supplies, and space? Do the procedures provide for documentation of standards for non-Federal share?

**Document Review: Non-Federal Share**

- Review: the supporting schedule for non-Federal share reported on the SF-269 report for the most recently completed award period as well as the non-federal share records for the most recently completed award period. Select sample entries from the supporting schedule.
  - Does the total amount on the grantee's supporting schedule agree with the amount reported on the SF-269 report?
  - Are amounts on the supporting schedule supported by source records?
- Using the sample from the supporting schedule, trace entries to the source record for donated space. Is the value of donated space supported by a current independent appraisal of fair market value?
- Using the sample from the supporting schedule, trace entries to the source record for donated supplies.
  - Are amounts claimed for donated supplies based on fair market value?
  - Do records show how donated supplies were used to achieve Head Start program objectives?
- Using the sample from the supporting schedule, trace entries to the source record for in-kind medical services. Are claims supported by records identifying specific children served, including service date?
- Using the sample from the supporting schedule, trace entries to the source records.
  - Are rates used for volunteer services based on an internal scale established by the grantee or delegate agency or prevailing wages in the labor market in which the grantee or delegate competes?
  - Are donated services documented by the same methods (to the extent feasible) used to support time worked by grantee or delegate employees?
  - For services donated by employees of other organizations, is time valued at the volunteer's actual pay rate?
  - Do volunteer records describe the provision of services benefiting the Head Start program and the service date or dates?

**Interview: Financial Officer (Non-Federal Share)**

- How does the program determine the value assigned to services? How does the program determine the value of donated space?



**Targeted Questions for Fiscal Management Question 2H**

- How does the program ensure that non-Federal share is supported by adequate documentation?
- How does the program ensure that volunteer services are supported by the same methods used to support time worked by employees, including time records?



### Fiscal Management Question 2I

Can the program demonstrate that its claimed non-Federal match through third-party contributions of volunteer services, goods, or supplies is allowable under the applicable cost principles and reasonable for accomplishing program objectives efficiently?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

74.23(a)(3), 74.23(d),  
74.23(f), 92.24(a)(1),  
74.23(a)(4), 92.24(b)(7)(i),  
92.24(c)(1)

### Targeted Questions for Fiscal Management Question 2I

#### Document Review: Accounting Policies and Procedures

- Does the organization have a procedure for determining whether third-party contributions of volunteer services, goods, or supplies are allowable?

#### Document Review: Non-Federal Share

- Review: the supporting schedule for non-Federal share reported on the SF-269 report for the most recently completed award period as well as non-Federal share records for the most recently completed award period.

Select entries from the supporting schedule and trace to the source records. Using the sample from the supporting schedule, trace entries to the source records.

All in-kind claims:

If these costs were paid with Federal cash, would they be considered necessary and reasonable for the provision of Head Start services?

- Using the sample from the supporting schedule, trace entries to the source records for in-kind medical services. Are claims unreasonable because the services were available universally to all children (e.g., Individuals with Disabilities Education Act [IDEA] services) or unallowable because the costs were paid from other Federal programs (e.g., Medicaid)?
- Using the sample from the supporting schedule, trace entries to the source records for use of grantee or delegate-owned buildings. Are claims for use of grantee- or delegate-owned space based on depreciation or use allowance -- derived from the building cost reflected in the organization's records and excluding acquisition or renovation costs paid by the Federal Government?

#### Interview: Financial Officer (Non-Federal Match)

- Can you describe the donated volunteer services, goods, or supplies provided to the grantee and delegate and claimed as non-Federal share by the grantee?
- How are costs derived from other Federal sources identified and excluded from the non-Federal share?
- How does your process identify and exclude volunteer services, goods, or supplies unallowable under the applicable cost principles?
- How does your system provide for periodic review of in-kind records to ensure policies and procedures are followed?

**Fiscal Management Question 2J**

Does the program have written procurement procedures that provide, at a minimum, all requirements specified in the applicable Federal statutes?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

92.36(c)(3), 74.44(a)

**Targeted Questions for Fiscal Management Question 2J****Document Review: Accounting Policies and Procedures**

- Do the organization's written procedures address the items required specifically by 74.44(a)(1-3)?
- Do the organization's written procedures address the items required specifically by 92.36(c)(3)?

**Interview: Financial Officer (Procurement)**

- Do the procedures specify actions to be taken to achieve the standard's requirements?
- How does the system provide for a documented analysis of lease and purchase alternatives?
- How does your system provide for periodic review of procurement records to ensure transactions comply with Federal regulations?



### Fiscal Management Question 2K

Are procurement transactions conducted in a manner that provides for open and free competition?

45 CFR Part 74.43; 45 CFR Part 92.36(c);

45 CFR Part 74.48 Provisions as applicable;

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);

45 CFR Part 92 for State, local, and Tribal governments.

74.43, 92.36(c), 74.48

### Targeted Questions for Fiscal Management Question 2K

#### Document Review: Accounting Policies and Procedures

- How do the policies and procedures provide for competition in procurement?

#### Document Review: Bank Reconciliations & General Ledger

- Based on a review of the general ledger or payables journal, select a sample of transactions, including high dollar amount, vendors frequently used by the organization, unusual items, and credit card transactions, and review source documents.
  - Do the costs appear necessary and reasonable for operation of the Head Start program?
  - Are the costs not disallowed specifically under the cost principles?
  - Is the procurement consistent with the organization's written policies and procedures?
  - Does evidence exist of price quotations or bids if required by the organization's policies and procedures?
  - Is the cost allocated to Head Start in proportion to the benefit received (as documented by the organization's cost allocation plan or other means)?
  - Does documentation exist of receipt or acceptance by the program before the invoice was processed for payment?
  - Is the cost supported by a contract (if appropriate)?
  - Is the invoice adequately descriptive to support the allowability of the cost?
  - Was the payment processed by an individual other than the orderer of the goods or services?
  - Was the payment made by a check signed by a person other than the orderer or the check preparer?
  - Was the invoice paid within a reasonable time frame?
  - For credit card transactions, is the transaction consistent with the organization's credit card policies?
  - For sole source transactions, has the organization documented why the procurement was made through a noncompetitive process?
  - For blanket (open) purchase orders, is the procurement method appropriate to the total annual purchases made against the blanket order?

#### Interview: Financial Officer (Procurement)

- Are you aware of ongoing arrangements for which there has not been recent evaluation of the procurement?
- Does periodic evaluation occur to determine whether procurement conforms to the organization's policies and procedures?
- How are staff made aware of procurement requirements?
- How does your system provide for open and free competition?

**Fiscal Management Question 2L**

APPLIES ONLY TO: Grantees

Has the Grantee made changes to the budget that required prior approval before receiving such approval in writing?

45 CFR Part 74.25; 45 CFR Part 92.30 (Select subsection or subsections of 45 CFR Parts 74.25, 92.30, as appropriate to the circumstance);

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);

45 CFR Part 92 for State, local, and Tribal governments.

Note: All changes requiring prior approval must be submitted in writing to the Regional Grants Officer. If the change involves a budget revision, the grantee must identify the changes on an SF-424 and an SF-424A. As provided in 45 CFR 74.25(K) and 45 CFR 92.30(A)(1), Regional Office approval of changes must be in writing and signed by either the Grants Officer, the ACF Regional Administrator, or the ACF Assistant Secretary.

74.25, 92.30

**Targeted Questions for Fiscal Management Question 2L****Document Review: Bank Reconciliations & General Ledger**

- Review the general ledger to determine whether the financial records establish that supplemental or one-time funds were expended for purposes listed in the FAA.
- Scan account detail for single items in excess of \$25,000. For a sample of transactions selected based on account code (e.g., equipment, supplies) or other factors, review source documentation to identify purchases of equipment with a unit cost of at least \$25,000.

**Document Review: Grant Application Budget Instrument (GABI)**

- Are the program options described in the approved refunding application consistent with options observed by the service reviewers?
- Review the grant application for the current award period. Are the current Executive Director, Finance Director, and Head Start Director different than those reflected on the grant application? If so, was Administration for Children and Families (ACF) approval obtained before new individuals were hired in these key positions?

**Document Review: Inventory and Equipment Records**

- Review property records to identify equipment with a unit cost of at least \$25,000 purchased with Head Start funds during the award period completed most recently.

**Document Review: Regional Office Correspondence**

- For items purchased with Head Start funds, does evidence exist of Regional Office approval on the FAA or through Regional Office correspondence?
- If supplemental or one-time funds were not expended for purposes listed in the FAA, did the grantee obtain prior written approval to use the funds for other purposes?  
In developing a PANC, include the exact restrictive language found in the Comments section of the FAA.
- If the observed program options differ from the approved refunding application, did the grantee obtain prior written approval from the Regional Office?

**Interview: Financial Officer (Accounting System)**





**Targeted Questions for Fiscal Management Question 2L**

- How does the accounting system provide for obtaining written approval before using Head Start funds to purchase equipment not provided in the approved budget?

**Interview: Financial Officer (Budget Changes)**

- Were supplemental or one-time funds (e.g., program improvement) awarded by ACF for specific purposes? If so, were funds used for other purposes without ACF's prior approval in writing?

**Fiscal Management Question 2M**

Are the program's contracts with a delegate as well as with childcare partnerships, transportation services, and professional services current, available, signed, and dated? Do they include the elements specified in the applicable regulations and cost principles?

2 CFR Part 230 for nonprofit organizations; 2 CFR 74.48(a)(b)  
2 CFR Part 225 for State, local, and Tribal governments;  
2 CFR Part 220 for educational institutions.

230, App A(A)(2)(g), 225, App A(C)(1)(j), 220, App A(A)(2)(e), 74.48(a), 74.48(b)

**Targeted Questions for Fiscal Management Question 2M****Document Review: Contracts, Payments, and Reimbursements**

- Scan the payables journal detail to identify purchases typically made under a contract. For these purchases, are there current, signed, and dated contracts with a description of services to be provided, an estimate of the time required, rate of compensation, and provision for termination?

**Interview: Financial Officer (Contracts)**

- Does a periodic review process exist to confirm that current, signed, and dated contracts are in place where required?
- How does the organization ensure that contractors conform to the contract terms, conditions and specifications?

**Interview: Financial Officer (Procurement)**

- How does the organization ensure that procurement transactions in excess of the simplified acquisition threshold (\$100,000) conform to applicable requirements?

**Fiscal Management Question 2N**

APPLIES ONLY IF: Grantee or delegate owns facilities used by the Head Start program that were not purchased with Federal funds

If the grantee or delegate owns any of the facilities used by the Head Start program that were not purchased with Federal funds, is only the depreciation or a use allowance based on the acquisition cost charged to the grant?

225, App B(11), 230, App B(11), 220, App A(J)(14)

**Targeted Questions for Fiscal Management Question 2N****Document Review: Audits**

- Do audit reports identify grantee-owned property not reflected in the property records? If so, determine whether any of the costs associated with these properties are charged to Head Start.

**Document Review: Inventory and Equipment Records**

- For items identified in FIS20.1-4, were charges to Head Start based on depreciation or use allowance?

**Document Review: Leases & Rent Documents**

- Does the organization write checks to itself for "rent" payments?

**Interview: Financial Officer (Facility Use Costs)**

- How does the financial system ensure that claims for the use of grantee- or delegate-owned space are based on depreciation or use allowance derived from the building cost reflected in the organization's records and excluding acquisition or renovation costs paid by the Federal Government?

**Fiscal Management Question 3A**

APPLIES ONLY IF: Facilities have been purchased, constructed, or renovated with Head Start grant funds

If the program owns facilities purchased, constructed, or renovated (major renovations only) with Head Start grant funds, is documentation available to show that the facilities transactions were approved and complied with Federal regulations? Was the Notice of Federal Interest filed?

1309.21(d)

**Targeted Questions for Fiscal Management Question 3A****Document Review: Audits**

- Does the audit report show that the total cost of buildings and improvements has increased since the last triennial review? If so, inquire as to the added buildings and improvements and the sources used for payment.
- For any audits completed after December 12, 2007, did the program submit to OHS, within 30 days of the audit being completed, an audit management letter and any audit findings as they relate to the Head Start program?

**Document Review: Bank Reconciliations & General Ledger**

- Does the balance sheet show that the total cost of buildings and improvements has increased since the last triennial review? If so, inquire as to the added buildings and improvements and the sources used for payment.

**Document Review: Financial Assistance Award (FAA)**

- Was the grantee awarded funds for purchase or major renovation (as defined in 1309.3(k)) of a building?

**Document Review: Notice of Federal Interest**

- For modularity situated on land not owned by the organization, has the owner posted a Notice of Federal Interest as described in 1309.31(b)? Does the Notice of Federal Interest comply with requirements in 45 CFR 1309.21?

**Interview: Financial Officer (Purchasing Facilities)**

- Can you describe your efforts to coordinate or collaborate with other providers to seek assistance, including financial assistance, before using grant funds to purchase a facility?
  - Have facilities been purchased with Head Start grant funds since the last triennial review? If so, can you provide a copy of the following:
    - Approval to purchase the facility (including paying the cost of amortizing the principal and interest on loans) from the Regional Office and
    - Each Notice of Federal Interest required to have been filed?
- Have you submitted the Notice of Federal Interest to the Regional Office?

### Fiscal Management Question 3B

Does the program have a process to ensure all contracts exceeding \$2,000 for constructing, renovating, or repairing buildings used by Head Start programs comply with the Davis-Bacon Act?

Note: The Davis-Bacon Act requires that any contractor hired to construct, renovate, or repair a Head Start facility (if the contract exceeds \$2,000) must pay all laborers and mechanics engaged in the construction, renovation, or repair "prevailing rate" wages. Under the provisions of the Act, contractors or their subcontractors are to pay workers employed directly upon the site of the work no less than the locally prevailing wages and fringe benefits paid on projects of a similar character. The Davis-Bacon Act directs the Secretary of Labor to determine such local prevailing wage rates (Department of Labor, <http://www.dol.gov/esa/programs/DBRA>).

1309.54

### Targeted Questions for Fiscal Management Question 3B

#### Document Review: Contracts, Payments, and Reimbursements

- Review building construction, renovation, and repair contracts, purchase orders, and payment files.
- For Head Start-funded contracts in exceeding \$2,000 for constructing, renovating or repairing buildings:
- Did the grantee or delegate obtain payroll certifications from the contractor?
  - Did the grantee or delegate compare the hourly rates reflected in the payroll certifications to the appropriate Department of Labor wage determination?

#### Document Review: SF-424

- Does evidence exist that the grantee requested, received, or expended Head Start funds for building construction, renovation, or repair?

#### Interview: Financial Officer (Davis-Bacon Act)

- Does the financial system provide for periodic monitoring to ensure the contract files document compliance with Davis-Bacon Act requirements adequately?
- How does the financial system assure that laborers and mechanics are paid prevailing wage on Head Start-funded construction, renovation or repair contracts exceeding of \$2,000?

**Fiscal Management Question 3C**

APPLIES ONLY TO: Private nonprofit organizations

Does the program make appropriate use of insurance to manage risks?

74.31, 74.21(b)(3),  
1309.23(a)(2), 1301.11(a),  
1301.11(b)**Targeted Questions for Fiscal Management Question 3C****Document Review: Insurance Policies**

- Are officials and employees of non-profit organizations authorized to disburse program funds bonded? 1301.11(b)
- Do sites listed on the grant application also appear as insured locations on the insurance policy?
- Do the payables files show the organization is current on its premium payments?
- Does insurance cover liability for accidents on premises owned by the organization?
- Does the organization have transportation liability insurance?
- Does the organization insure vehicles purchased using Head Start funds? 74.31
- If student accident insurance is not a separate policy and not identifiable in the declaration page of a master policy, is there confirmation from the insurer of accident coverage for Head Start students? 1301.11(a)

**Document Review: Inventory and Equipment Records**

- Review property records to identify property purchased using Head Start funds. Do the insurance policies reflect appropriate coverage for these assets? 1309.23(a)(2)

**Interview: Financial Officer (Insurance)**

- Are officials and employees authorized to disburse program funds bonded?
- Does the organization have a process for periodic review of risks and insurance coverage?
- How do you ensure the level of insurance for property acquired with Federal funds is equivalent to the level of insurance on all other property owned by the organization?
- How does the financial system ensure that charges for self-insurance reserves are based on reasonable estimates?
- How does the financial system ensure that insurance rebates and credits allocable to Head Start are applied as a cost reduction or cash refund?
- How does the financial system ensure that risks are identified and insurance coverage obtained where appropriate?

**Fiscal Management Question 3D**

Does the program meet property management standards for equipment purchased using Head Start funds, including conducting a physical inventory every 2 years and maintaining vehicle titles?

CFR 74.34(a)(1-3) can be stacked;

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);

45 CFR Part 92 for State, local, and Tribal governments.

74.34(g), 92.31, 92.32,  
74.34(f)(1)(i), 74.34(f)(1)(ii),  
74.34(f)(1)(iii), 74.34(f)(1)(iv),  
74.34(f)(1)(v), 74.34(f)(1)(vi),  
74.34(f)(1)(vii),  
74.34(f)(1)(viii), 74.34(f)(3)

**Targeted Questions for Fiscal Management Question 3D****Document Review: Bank Reconciliations & General Ledger**

- Review general ledger detail for expenditures of \$25,000 or greater for equipment with a useful life of 1 year or more. 74.34(g), 92.32

**Document Review: Financial Assistance Award (FAA)**

- Review the FAA to determine whether the grantee received Head Start funds for equipment purchases.

**Document Review: Inventory and Equipment Records**

- Review the equipment records. Do records exist for all equipment (including vehicles)? 74.34(f)(1)(i), 74.34(f)(1)(ii), 74.34(f)(1)(iii), 74.34(f)(1)(iv), 74.34(f)(1)(v), 74.34(f)(1)(vi), 74.34(f)(1)(vii), 74.34(f)(1)(viii)

Do the records include all required elements: equipment description; serial number; equipment source, including award number; whether title vests in the recipient or the Federal Government; acquisition date; information from which the percentage of HHS's share in the equipment cost can be calculated; equipment location and condition and date the information was reported; unit acquisition cost; and ultimate disposition data, including disposal date and sales price?

- Was a physical inventory of equipment conducted within the last 2 years? Is the inventory document signed by the person or persons who observed the inventory? On a test basis, do amounts and quantities reflected in the inventory agree with the equipment records? 74.34(f)(3)

**Interview: Financial Officer (Equipment)**

- How does the financial system ensure that records are maintained for all equipment with a unit cost of \$25,000 or greater? 74.34(g), 92.32

**Fiscal Management Question 3E**

Has the program encumbered, mortgaged, or put up as collateral property acquired or improved with Head Start funds?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

74.37, 92.31(b), 1309.21(b)

**Targeted Questions for Fiscal Management Question 3E****Document Review: Audits**

- Does the audit report show notes or mortgages payable?

**Document Review: Bank Reconciliations & General Ledger**

- Does the balance sheet show notes or mortgages payable?

**Document Review: Inventory and Equipment Records**

- If debts are secured by property, consult the property records to determine the percentage of Federal ownership. (Alternately, review grant applications and Federal Assistance Awards to identify Federal funds awarded for buildings.)

**Document Review: Regional Office Correspondence**

- Review debt agreements to determine whether loans are secured by assets and property owned by the organization. Was this approved by the Regional Office?
- Review Regional Office correspondence to determine whether approval was obtained before using property purchased or renovated using Federal funds as collateral.

**Interview: Financial Officer (Mortgage of Property Acquired)**

- Did the grantee and delegate obtain HHS written approval in connection with the encumbrance or mortgage of property acquired or improved with Head Start funds?



**Fiscal Management Question 3F**

Did the program properly account for property rental transactions with related parties?

230, App B(43)(c), 225, App B(37)(c), 220, App A(J)(43)(c)

**Targeted Questions for Fiscal Management Question 3F****Document Review: Governing Body Meeting Minutes**

- Is there evidence in the Governing Body meeting minutes of related party transactions and/or of a related party controlling transactions of the organization?

**Document Review: IRS Forms**

- Does the IRS Form 990 contain evidence of a related party under the organization's control (or a related party controlling the organization)?
- On any leases, did grantee or delegate staff sign as both lessor and lessee?  
Are any of the leases with entities identified in the review of the IRS Form 990 or governing body meeting minutes??

**Document Review: Leases & Rent Documents**

- Review the related party's financial records. Is the cost of space furnished by the related party limited to the cost of ownership?

**Interview: Financial Officer (Rent)**

- How does the financial system ensure the cost of space provided a party controlled by the organization (or a party that controls the organization) does not exceed the cost of ownership, defined as costs such as depreciation or use allowance, maintenance, taxes, and insurance?



#### Fiscal Management Question 4A

Are the program's original time records prepared properly and approved properly by a responsible supervisory official having knowledge of the work performed?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App B(8)(m)(1), 230, App B(8)(m)(2), 225, App B(8)(h)(1), 225, App B(8)(h)(4), 220, App A(J)(10)(a), 220, App A(J)(10)(b), 220, App A(J)(10)(d)

#### Targeted Questions for Fiscal Management Question 4A

##### Document Review: Cost Allocation Plan

- For the sample selected from the payroll journal, was the allocation of time in the general ledger based on the employee's personnel activity report?

##### Document Review: Salaries & Payroll

- Does evidence exist of payroll approval by a responsible organization official?  
From the payroll journal, select a sample of employees paid in a recent time period. The sample should include staff allocated between Head Start and other programs.
- For the sample selected from the payroll journal, do total hours for the employee agree with the timesheet?
- For the sample selected from the payroll journal, were the personnel activity reports signed by the individual employee or by a supervisor with first-hand knowledge?

##### Interview: Financial Officer (Personnel Activity Reports)

- Are salaries allocated based on the employee's actual activity in each program?
- Does the allocation of time between programs recorded on the personnel activity report agree with the allocation of salary expense in the grantee and delegate's financial records?
- Does the program maintain after the fact activity reports, signed by a responsible supervisory official having first-hand knowledge of the work performed, that represent the actual work performed by the employee during the period covered by the report?

##### Interview: Financial Officer (Timesheets)

- Do all employees (including exempt employees) complete timesheets? Do timesheets for non-professional employees report actual time worked during the pay period?

**Fiscal Management Question 4B**

Are program staff charged to the grant compensated (salary and other forms of compensation) at a rate exceeding Executive Level II (\$168,000 through December 31, 2007; \$172,200 through December 31, 2008)? (Consider gross pay from all funding sources.) If the grantee and delegate have received a Cost of Living Adjustment (COLA) for Quality funds, or both, did the award comply with the terms of their grant application?

2 CFR Part 230 for nonprofit organizations

2 CFR Part 225 for State, local, and Tribal governments

2 CFR Part 220 for educational institutions

230, App A(A)(2)(b), 225, App A(C)(1)(d), 220, App A(C)(2), 653(b)(1), 653(b)(2)(A), 653(b)(2)(B)

**Targeted Questions for Fiscal Management Question 4B****Document Review: Salaries & Payroll**

- Do payroll journals show any employee with compensation exceeding the Level II rate?
- Do the IRS 990 for the prior period and W-2 statements show any employee with compensation exceeding the Level II rate?
- Review the grant application requesting the COLA for the most recent period for which it was awarded and the FAA that awarded funding for the COLA. What was the percentage increase proposed by the grantee and awarded by ACF?
- Review: the salary scale at the beginning of award period and at the end of award period. Was the end-of-period salary scale increased by at least the COLA percentage?

**Interview: Financial Officer (COLA)**

- Can the grantee and delegate show that the entire COLA amount was expended for the purposes specified in the award document?
- Does the COLA increase become a permanent part of the employees' ongoing wage as well as increasing the organization's wage scales?
- How does the organization ensure that COLA is paid to employees retroactively to the beginning of the award period?

**Interview: Financial Officer (Compensation)**

- Do the grantee and delegate have affiliates, subsidiaries, or other related entities? Do staff charged to the grant also receive compensation from a related entity? For this staff, does total compensation from all sources exceed the cap amount?
- Does the grantee agency employ any individual or individuals compensated directly, or as part of an indirect cost pool, at or near the rate payable for Level II of the Executive Schedule (\$172,200 through December 31)? If so, identify the individual or individuals.



#### Fiscal Management Question 4C

Are program staff wages charged to the grant reasonable and supported by appropriate wage comparability data?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments.

230, App B(8)(c), 225, App B(8)(b)

#### Targeted Questions for Fiscal Management Question 4C

##### Document Review: Salaries & Payroll

- Are Head Start employee pay rates (including rates for shared staff allocated in part to Head Start) supported by the wage comparability study?  
  
If rates are not supported by the wage comparability study, can the program document that rates are comparable to similar positions within the grantee or delegate organization?  
  
(Note: In developing a PANC, review the organization's audit report to determine whether the organization is predominantly engaged in federally funded activities.)
- Was the wage comparability study revised within the last 3 years? Are the positions identified in the wage comparability study reasonably comparable to the organization's Head Start positions? Are comparisons based on the labor markets in which the organization competes?

##### Interview: Financial Officer (Wages)

- How does the financial system ensure that wages are consistent with wages paid for similar work in the grantee and delegate's other activities or to wages paid for similar work in the labor markets in which the organization competes?

### Fiscal Management Question 5A

Are program financial reports and accounting records current, accurate, and available? Do they contain information pertaining to grant or sub-grant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);  
45 CFR Part 92 for State, local, and Tribal governments.

74.21(b)(2), 92.20(b)(2),  
74.21(b)(1), 92.20(b)(1)  
Link: PDM6B

### Targeted Questions for Fiscal Management Question 5A

#### Document Review: Administrative Costs

- As of what date was the most recent administrative cost report produced?

Procedure: On a test basis, trace amounts from the administrative cost report to the corresponding general ledger. Does the administrative cost report agree with the organization's general ledger?

During the most recent year, was the administrative cost report produced with sufficient frequency to allow the grantee to monitor compliance with the administrative cost limitation effectively on an ongoing basis?

#### Document Review: Bank Reconciliations & General Ledger

- Based on a scan of the general ledger, do amounts appear to be posted to the proper accounts? Are there unusual transactions? (If so, follow up with an interview with the financial officer). Can amounts reflected in the general ledger be traced to financial reports?
- Review balance sheet account reconciliations for the past year. Does the organization reconcile balance sheet accounts (e.g., property and equipment reconciled to the property records, accounts payable reconciled to detail listing, notes payable reconciled to bank balances) periodically?

#### Document Review: Non-Federal Share

- What is the date on the most recent non-Federal cost report?

Procedure: On a test basis, trace amounts from the non-Federal cost report back to the organization's summary schedule? Based on the above procedure, is the non-Federal cost report supported by records?

During the most recent year, was the non-Federal cost report produced with sufficient frequency to allow the grantee to monitor compliance effectively with the requirement to limit Federal participation to 80 percent of total costs?

#### Interview: Financial Officer (Financial Reports)

- How are obligations recorded and reconciled?
- How do you ensure that financial reports capture information accurately from the financial records?
- How does your system identify separately the cash received and expended for each Early Head Start and Head Start award?
- How often are balance sheet accounts reconciled to subsidiary ledgers or external statements to substantiate that account balances are correct? Which accounts are reconciled?
- How often are reports of non-Federal share and administrative costs updated?

**Fiscal Management Question 5B**

Has the program established and maintained efficient, effective reporting systems that have generated:

- Internal Revenue Service (IRS) 941 (Employer's Quarterly Federal Tax Return),
- IRS 990 (Return of Organization Exempt from Income Tax),
- IRS 5500 (Annual Return/Report of Employee Benefit Plan), and
- Other official Federal, State, and local reports as required by applicable law?

1304.51(h)(2), 92.41(b)(4),  
74.52(a)(2)(iii), 92.41(c)(4),  
74.52(a)(1)(iv), 647(c)(2)  
Link: PDM6B

**Targeted Questions for Fiscal Management Question 5B****Document Review: Audits**

- Review the SF-SAC audit data collection form. Were audits filed with the Single Audit Clearinghouse within 9 months of the end of each of the last 3 fiscal years?

**Document Review: Contracts, Payments, and Reimbursements**

- Did the organization file USDA reports within the required timeframe?

**Document Review: IRS Forms**

- Did a review of IRS correspondence identify unresolved compliance issues?
- On a sample basis, trace tax deposits reflected on the IRS Form 941 to evidence of payment (i.e., check or electronic transfer) on the bank statement. Was the organization current in its payroll taxes?
- Review the IRS Form 990. Was it filed by the 15th day of the 5th month after the organization's fiscal year end, or was an extension obtained? Obtain documentation of extension.
- Were IRS Form 941 reports filed timely?

**Document Review: PSC-272**

- Are disbursements on the PSC-272 report reconciled to expenses on the SF-269 report? Are reasonable explanations furnished for reconciling items?
- Review PSC-272 reports for the most recent 3 years. Was the grantee timely in filing these reports?

**Document Review: SF-269 Financial Reports**

- For the most recently closed and audited Head Start award period is the final SF-269 report reconciled to the audited financial statements and to the general ledger? Are reasonable explanations furnished for reconciling items?
- Review the SF-269 reports for the most recent 3 years. Was the grantee timely in filing these reports?

**Interview: Financial Officer (Financial Reports)**

- Were the grantee and delegate's required financial reports, including the SF-269 Financial Status Report, the PSC-272 Federal Cash Transactions Report, and the detailed accounting of development and administrative expenses, completed and



#### Targeted Questions for Fiscal Management Question 5B

submitted to the Federal funding agency? Were they timely?

#### Interview: Financial Officer (Reporting)

- Were the grantee and delegate's required audits completed and submitted? Were they timely? For the last 3 years, did the grantee and delegate submit an audit to the Single Audit Clearinghouse within 9 months of year end?
- Were the grantee and delegate's required reports completed and submitted to the IRS? Were they timely?
- Were the grantee and delegate's required reports completed and submitted to the USDA? Were they timely?

**Fiscal Management Question 5C**

Are periodic financial status reports provided to program governing bodies, policy groups, and staff to advise them and to control program quality and maintain program accountability?

1304.51(h)(1)  
Link: PDM6B

**Targeted Questions for Fiscal Management Question 5C****Document Review: Financial Reports**

- Are financial reports presented in logical groupings and with sufficient detail to allow the reader to understand the financial operations of the organization and the Head Start award?  
Do financial reports provide for a budget-to-actual comparison?  
Are financial reports generated to support the management of organizational components for which they are responsible?  
Does evidence exist that periodic financial reports are distributed to the governing body?
- Review reports provided to the governing body. How much time elapsed between the end of the reporting period and the date on which reports were presented to the governing body? Did the organization present timely financial reports to the governing body?  
On a test basis, trace reported amounts back to the general ledger. Were financial reports to the governing body accurate?

**Interview: Financial Officer (Reporting)**

- Do the reports include sufficient detail (including budget information, non-Federal share expenditures, and the status of administrative limitation) to allow users to monitor the program's financial progress?
- What specific financial reports are provided to governing bodies and policy groups and when are they provided? Do the reports include monthly financial statements, including credit card expenditures, the financial audit, and fiscal findings of the annual Self-Assessment?

**Interview: Governing Body Members, Head Start Director, Policy Council Member (Reporting)**

- What financial reports do you receive, when do you receive them, and what information do they include? Are these reports clear and comprehensive? Do they help you keep track of the program's progress?





## Program Design and Management

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Program Design and Management section of the Protocol is divided into eight subsections:

*Section 1: Governing Body*

*Section 2: Policy Council*

*Section 3: Planning*

*Section 4: Ongoing Monitoring*

*Section 5: Communications*

*Section 6: Record Keeping and Reporting*

*Section 7: Human Resources*

*Section 8: Program Strengths*



### Program Design and Management Question 1A

Does the composition of the governing body reflect the following:

- At least one member has a background and expertise in fiscal management or accounting;\*
- At least one member has a background and expertise in early childhood education and development;
- At least one member is a licensed attorney familiar with issues that come before the governing body;
- Additional members who reflect the community and include parents of formerly or currently enrolled Head Start (HS) children; and
- Other members selected for their expertise in education, business administration, or community affairs?

Note: \*The Fiscal Reviewer will monitor for program compliance with this requirement.

Exceptions shall be made to the requirements of clauses (i) to (iv) for members of a governing body when those members oversee a public entity and are selected to their positions with the public entity by public selection or political appointment.

If an Head Start agency is unable to include members for any of the first three categories above, the governing body must obtain the services of a consultant or other individual with the required background and expertise to work with the governing body instead.

642(c)(1)(B)(ii),  
642(c)(1)(B)(iii),  
642(c)(1)(B)(iv)

### Targeted Questions for Program Design and Management Question 1A

#### Document Review: Governing Body Membership Roster

- Describe the types of members the governing body includes, and whether the required expertise and background of governing body members is met.

#### Interview: Governing Body Members (Composition)

- Are you a parent of a child currently or formerly enrolled in the program? 642(c)(1)(B)(iv)
- Can you describe your expertise and background (e.g., experience, degrees)?
- Is there a member (or consultant) who is a licensed attorney? 642(c)(1)(B)(iii)  
Verify the attorney's qualifications.
- Which member (or consultant) possesses expertise in early childhood development and education? What is your experience with children from birth to age 5? 642(c)(1)(B)(ii)  
(Note: A wide range of experiences might apply.)



**Program Design and Management Question 1B**

Have current governing body members received appropriate training and technical assistance to ensure they understand the information they receive and can oversee and participate in the program effectively?

642(d)(3), 1304.52(l)(4)

**Targeted Questions for Program Design and Management Question 1B**

**Document Review: Training Plans and Materials**

- Describe training plans and materials (e.g., agendas, guidance documentation), and determine whether governing body members received training.

**Interview: Governing Body Members (Training)**

- Have you received training? When did you receive it? Can you describe the training? What topics were covered? How did it help you in your role?

**Interview: Head Start Director (Training)**

- When was training last provided for the governing body members? Who received the training? What topics were covered? Are training plans or materials available?

**Program Design and Management Question 1C**

Do governing body members receive the following information or reports:

- Monthly financial statements, including credit card expenditures;
- Monthly program information summaries;
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency;
- Monthly reports of meals and snacks provided through Department of Agriculture programs;
- Financial audit;
- Annual Self-Assessment, including findings related to such assessment;
- Community-wide strategic planning and needs assessment (i.e., Community Assessment) of the Head Start agency, including applicable updates;
- Communication and guidance from the Secretary; and
- Program information reports?

Note: Single or multiple reports may be used to capture the information listed above.

Grantees receiving their first-year review might not have completed a Self-Assessment.

642(d)(2)(A), 642(d)(2)(B),  
642(d)(2)(C), 642(d)(2)(D),  
642(d)(2)(E), 642(d)(2)(F),  
642(d)(2)(G), 642(d)(2)(H),  
642(d)(2)(I)  
Link: PDM6B

**Targeted Questions for Program Design and Management Question 1C****Document Review: Governing Body Reports**

- Before conducting your interviews, review a sample of reports provided to the governing body. Does the governing body receive the required reports? Do reports contain sufficient information to be useful during governing body meetings?

**Interview: Governing Body Members (Reporting)**

- Do the reports provide sufficient information to determine where the program is strong and where it might need improvement? Once you receive the reports, do you have sufficient time to review them and make informed decisions?
- What reports do you receive? How often do you receive them? What are the follow-up procedures associated with them? How do you use these reports during meetings?

**Interview: Governing Body Members, Head Start Director (Self-Assessment)**

- How is the Self-Assessment conducted? How are you involved in the program's annual self-assessment of its effectiveness and of its progress in meeting local Head Start program goals and implementing Federal requirements?

**Program Design and Management Question 1D**

Does the governing body perform the following activities to support program administration and implementation:

- Selecting delegate agencies and the service areas for such agencies;
- Establishing procedures and criteria for recruiting, selecting, and enrolling children;
- Developing procedures for selecting Policy Council members;
- Establishing, adopting, and periodically updating written standards of conduct that determine how complaints are disclosed, addressed, and resolved, including investigations; and
- Reviewing all applications for funding and amendments to applications for funding?

642(c)(1)(E)(iv)(I),  
642(c)(1)(E)(iv)(II),  
642(c)(1)(E)(iv)(III),  
642(c)(1)(E)(iv)(VI),  
642(c)(1)(E)(iv)(X)

**Targeted Questions for Program Design and Management Question 1D****Document Review: Governing Body Meeting Minutes**

- Review the governing body meeting minutes. Has the governing body selected delegate agencies; established procedures and criteria for recruiting, selecting and enrolling children; and developed procedures for selecting Policy Council members? Has it established written standards for resolving complaints?

**Interview: Governing Body Members (Responsibilities)**

- Has the governing body developed procedures for selecting Policy Council members? What are these procedures? 642(c)(1)(E)(iv)(VI)
- Have written standards of conduct been established and adopted for disclosing, addressing, and resolving complaints, including investigations? How often are these standards updated? 642(c)(1)(E)(iv)(X)
- How does the governing body select delegate agencies and service areas? Are results of the Community Assessment reviewed annually to determine whether changes are needed? 642(c)(1)(E)(iv)(I)
- What procedures and criteria have been established for recruiting, selecting, and enrolling of children? How do these procedures and criteria ensure eligible children are being identified within the service area? Are results of the Community Assessment reviewed and considered to determine whether changes are needed? 642(c)(1)(E)(iv)(II)



#### Program Design and Management Question 1E

Does the governing body review and approve all major policies of the grantee, including the following:

- Annual Self-Assessment and financial audit;
- Program's progress in carrying out the grant application provisions, including implementation of corrective actions;
- Personnel policies regarding hiring, evaluation, termination, and compensation;
- Policies and procedures regarding hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Financial Officer, or other person in an equivalent position; and
- Results from monitoring, including appropriate follow-up activities?

642(c)(1)(E)(iv)(V)(aa),  
642(c)(1)(E)(iv)(V)(bb),  
642(c)(1)(E)(iv)(V)(cc),  
642(c)(1)(E)(iv)(VIII),  
642(c)(1)(E)(iv)(IX)

#### Targeted Questions for Program Design and Management Question 1E

##### Interview: Governing Body Members (Responsibilities)

- Can you describe the process of reviewing and approving the program's progress in carrying out the grant application provisions? 642(c)(1)(E)(iv)(V)(bb)
- How are you given the opportunity to review the results from monitoring, including appropriate follow-up activities? 642(c)(1)(E)(iv)(VIII)
- How do you review and approve personnel policies regarding hiring, evaluation, compensation, and termination of employees? 642(c)(1)(E)(iv)(V)(cc)
- What is your role in reviewing and approving policies and procedures regarding hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Financial Officer, or other person in an equivalent position? 642(c)(1)(E)(iv)(IX)
- What were the findings of the annual Self-Assessment and financial audit? How did you work with the program to develop a corrective action plan, if needed? 642(c)(1)(E)(iv)(V)(aa)

**Program Design and Management Question 1F**

Does the governing body approve financial management, accounting, and reporting policies, including:

- Grantee's major financial expenditures;
- Grantee's annual operating budget;
- Selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors who report all critical accounting policies and practices to the governing body; and
- Monitoring of the agency's actions to correct audit findings and monitoring of other action necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices?

642(c)(1)(E)(iv)(VII)(aa),  
642(c)(1)(E)(iv)(VII)(bb),  
642(c)(1)(E)(iv)(VII)(cc),  
642(c)(1)(E)(iv)(VII)(dd)

**Targeted Questions for Program Design and Management Question 1F****Interview: Governing Body Members (Responsibilities)**

- As a member of the governing body, what are your legal and fiscal responsibilities?
- How do you monitor the program's actions for correcting audit findings and other actions necessary to comply with applicable laws? 642(c)(1)(E)(iv)(VII)(dd)
- How do you select independent financial auditors? What do they report to the governing body? 642(c)(1)(E)(iv)(VII)(cc)
- What is the process for approving financial expenditures? 642(c)(1)(E)(iv)(VII)(aa)
- What is the process for approving the operating budget? 642(c)(1)(E)(iv)(VII)(bb)



**Program Design and Management Question 1G**

Has the governing body fulfilled its major responsibilities, including legal and fiscal administration and oversight; assuring active, independent, and informed governance; and ensuring compliance with applicable laws and regulations?

642(c)(1)(E)

**Targeted Questions for Program Design and Management Question 1G**

**Document Review: Summary Analysis**

- Based on your analysis of the governing body with respect to training and technical assistance (CQ PDM1B), reporting (CQ PDM1C), activities to support program administration and implementation (CQ PDM1D), approval of all major policies (CQ PDM1E), and approval of financial management, accounting, and reporting policies (CQ PDM1F), how would you describe the governing body's ability to fulfill its major responsibilities?



**Program Design and Management Question 2A**

Has the program established a Policy Council or Policy Committee, and a Parent Committee in accordance with Head Start requirements?

Note: Policy Council applies to a Head Start grantee; Policy Committee applies to a delegate agency.

642(c)(2)(B)(ii)(I),  
642(c)(2)(B)(ii)(II),  
1304.50(a)(1)(iii),  
642(c)(2)(B)(i), 642(c)(3)(A)

**Targeted Questions for Program Design and Management Question 2A****Document Review: Enrollment Rosters**

- Review the Policy Council or Policy Committee membership roster and child enrollment roster to determine whether at least 51 percent of membership comprises parents of children currently enrolled in the program and whether all other members are drawn from the community served by the Head Start agency (including any delegate agency).

(Note: Membership may include parents of formerly enrolled children.) 642(c)(2)(B)(ii)(I), 642(c)(2)(B)(ii)(II)

**Document Review: Policy Council Meeting Minutes**

- Review Policy Council meeting minutes to determine whether parents were elected annually.

**Interview: Policy Council or Policy Committee Member (Composition)**

- Have all centers or other program options, including local level programs, established parent committees? 1304.50(a)(1)(iii)

**Interview: Policy Council or Policy Committee Member (Composition)**

- Is the Policy Council or Policy Committee elected by the parents of children currently enrolled in the Head Start program? How often and when do elections occur? 642(c)(2)(B)(i)
- What is the composition of the Policy Council or Policy Committee? Are at least 51 percent of the members parents of children currently enrolled in the Head Start program? Are all other members drawn from the community served by the Head Start agency?

(Note: Membership may include parents of formerly enrolled children.) 642(c)(2)(B)(ii)(I), 642(c)(2)(B)(ii)(II)



**Program Design and Management Question 2B**

Does the program have a Policy Council or Policy Committee responsible for the Head Start program's direction, including program design and operation, and long- and short-term planning goals, taking into account the annual Community Assessment and Self-Assessment?

642(c)(2)(A)

**Targeted Questions for Program Design and Management Question 2B**

**Interview: Policy Council or Policy Committee Member (Responsibilities)**

- Does the program help you use Community Assessment and Self-Assessment in making decisions about the program?
- How do you help the Head Start program decide what it is going to do to help families? Do you have opportunities to talk with staff about services and hours of operation? Can you recall a decision the Policy Council made, or will make, to improve services to children and families?



### Program Design and Management Question 2C

Are Policy Council or Policy Committee members free of financial or other conflict of interest?

Note: When determining whether conflict of interest exists, note the following:

- Parents may occasionally substitute for regular Early Head Start or Head Start staff (1304.50(b)(6)).
- Policy Council, Policy Committee and Parent Committee members may receive reimbursements for reasonable expenses incurred (1304.50(f)).

642(c)(2)(C)(ii), 1304.50(b)(6),  
642(c)(2)(C)(i)

### Targeted Questions for Program Design and Management Question 2C

#### Interview: Policy Council or Policy Committee Member (Conflict of Interest)

- Are you, or any member of your immediate family, an employee of the grantee or delegate or related to an employee of the grantee or delegate? 1304.50(b)(6)
- Do you receive compensation for serving on the Policy Council or Policy Committee or for providing services to the Head Start agency?

(Note: Reimbursement is permitted for serving as an occasional classroom substitute.) 642(c)(2)(C)(ii)



#### Program Design and Management Question 2D

Have the Policy Council or Policy Committee members received orientation and ongoing training and technical assistance to ensure that they can oversee and participate in program administration effectively?

1304.52(l)(4)

#### Targeted Questions for Program Design and Management Question 2D

##### Document Review: Training Plans and Materials

- Describe training plans and materials (e.g., agendas, guidance documentation) and determine whether Policy Council or Policy Committee members receive orientation and ongoing training.

##### Interview: Head Start Director (Training)

- When did Policy Council or Policy Committee members last receive training? Who received the training? Are training plans or materials available?

##### Interview: Policy Council or Policy Committee Member (Training)

- Have you received training? When did you receive it? Can you describe the training? What topics were covered? How did it help you in your role?



#### Program Design and Management Question 2E

Do the Policy Council or Policy Committee members receive the following information or reports:

- Monthly financial statements, including credit card expenditures;
- Monthly program information summaries;
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency;
- Monthly reports of meals and snacks provided through Department of Agriculture programs;
- Financial audit;
- Annual Self-Assessment, including findings related to such assessment;
- Community-wide strategic planning and needs assessment (i.e., Community Assessment) of the Head Start agency, including any applicable updates;
- Communication and guidance from the Secretary; and
- Program information reports.

Note: A single or multiple reports may be used to capture the information listed above.

642(d)(2)(A), 642(d)(2)(B),  
642(d)(2)(C), 642(d)(2)(D),  
642(d)(2)(E), 642(d)(2)(F),  
642(d)(2)(G), 642(d)(2)(H),  
642(d)(2)(I)  
Link: PDM6B

#### Targeted Questions for Program Design and Management Question 2E

##### Document Review: Policy Council Reports

- Before your interview, review a sample of reports provided to the Policy Council. Does the Policy Council receive the required reports? Do reports contain sufficient information to be useful during Policy Council meetings?

##### Interview: Policy Council or Policy Committee Member (Reporting)

- Do the reports provide sufficient information to determine where the program is strong and where it might need improvement? Once you receive the reports, do you have sufficient time to review them and make informed decisions and recommendations?
- What reports do you receive? How often do you receive them? Are reports useful in helping you understand how the program operates? If you have questions about reports, do staff answer your questions? How do you use these reports during meetings?

**Program Design and Management Question 2F**

Has the Policy Council or Policy Committee approved and submitted to the governing body decisions about each of the following activities:

- Program recruitment, selection, and enrollment priorities;
- By-laws for Policy Council operations;
- Applications for funding and amendments to applications for funding for programs before application submission;
- Budget planning for program expenditures, including policies for reimbursement and participation in Policy Council activities;
- Program personnel policies and decisions regarding employment of all program staff, including standards of conduct for program staff, contractors, and volunteers and criteria for employment and dismissal of program staff;
- Developing procedures for electing Policy Council members; and
- Recommendations for selecting program agencies and service areas for such agencies?

642(c)(2)(D)(ii),  
642(c)(2)(D)(iii),  
642(c)(2)(D)(iv),  
642(c)(2)(D)(v),  
642(c)(2)(D)(vi),  
642(c)(2)(D)(vii),  
642(c)(2)(D)(viii)

**Targeted Questions for Program Design and Management Question 2F****Document Review: Policy Council Meeting Minutes**

- Review meeting minutes and determine whether the Policy Council/Committee approved and submitted to the governing body decisions about each of the following activities:
- Program recruitment, selection, and enrollment priorities;
  - By-laws for Policy Council operation;
  - Applications for funding and amendments to applications for funding for programs before application submission;
  - Budget planning for program expenditures, including policies for reimbursement and participation in Policy Council activities;
  - Program personnel policies and decisions regarding employment of all program staff, including standards of conduct for program staff, contractors, and volunteers and criteria for employment and dismissal of program staff;
  - Developing procedures for electing Policy Council member; and
  - Recommendations for selecting program agencies and service areas for such agencies.

**Program Design and Management Question 2G**

If necessary, does the program provide reimbursements for reasonable expenses to enable low-income Policy Council, Policy Committee, and Parent Committee members to participate fully in their group responsibilities?

1304.50(f)

**Targeted Questions for Program Design and Management Question 2G****Interview: Policy Council or Policy Committee Member (Conflict of Interest)**

- Do parents receive reimbursement for reasonable expenses to participate fully as a Policy Council member?

(Note: Reimbursement for travel and other related expenses is permissible.)

**Interview: Policy Council or Policy Committee Member (Responsibilities)**

- How has the Policy Council/Committee approved and submitted to the governing body decisions about each of the following activities:
- Program recruitment, selection, and enrollment priorities;
  - By-laws for the operation of the policy council;
  - Applications for funding and amendments to applications for funding for programs prior to submission of applications;
  - Budget planning for program expenditures, including policies for reimbursement and participation in policy council activities;
  - Program personnel policies and decisions regarding the employment of all program staff, including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff;
  - Developing procedures for how members of the policy council will be elected; and
  - Recommendations on the selection of program agencies and the service areas for such agencies?

**Program Design and Management Question 3A**

APPLIES ONLY TO: Grantees

Has the program conducted a Community Assessment once every 3 years within its service area, which included the collection and analysis of the elements required in 1305.3(c)(1)-(6)?

Note: The 2007 Head Start Act refers to the Community Assessment as a community-wide strategic planning and needs assessment.

1305.3(c), 1305.3(c)(1),  
1305.3(c)(2), 1305.3(c)(3),  
1305.3(c)(4), 1305.3(c)(5),  
1305.3(c)(6), 1305.3(e)

**Targeted Questions for Program Design and Management Question 3A****Document Review: Community Assessment and Updates**

- Based on the program's data analysis, what are the education, health, nutrition, and social service needs of eligible children and their families? 1305.3(c)(4)
- Has the program conducted a Community Assessment once every 3 years within its service area? 1305.3(c)
- What are the needs of eligible families and local community agencies with respect to education, health, nutrition, and social services? 1305.3(c)(5)
- What is the demographic makeup of eligible children and families? How many eligible families are estimated to live in the community? Where do most of these families reside? What is the racial, linguistic, and ethnic composition of these families? 1305.3(c)(1)
- What is the estimated number of children with disabilities who are 4 years old or younger? What are the types of disabilities? What are the relevant services and resources provided to these children by other community agencies? 1305.3(c)(3)
- What other entities were involved with the Community Assessment process, such as family support, child abuse prevention and protective services, foster care, services for families where English is not the language customarily spoken, services for children with disabilities, and services for homeless children?
- What resources has the program determined are available and accessible in the community that could be used to address the needs of eligible families? 1305.3(c)(6)
- What types of child development and childcare programs serve eligible children? Do local preschool programs exist? How many eligible children do all other programs serve? 1305.3(c)(2)
- When was the last review of the grantee's service area to determine whether significant changes have occurred? Was the Community Assessment updated accordingly? Can you describe relevant updates? 1305.3(e)



**Program Design and Management Question 3B**

Does the program use information from the Community Assessment for program planning?

Note: The 2007 Head Start Act refers to the Community Assessment as a community-wide strategic planning and needs assessment.

1305.3(d)(2), 1305.3(d)(3),  
1305.3(d)(4), 1305.3(d)(5),  
1305.3(d)(6), 1304.51(a)(1)(i)  
Link: PDM3F

**Targeted Questions for Program Design and Management Question 3B****Interview: Head Start Director (Planning - Community Assessment)**

- How did the program determine its recruitment area and set criteria for the types of children and families who would be given priority for recruitment and selection? 1305.3(d)(3), 1305.3(d)(6)
- How did the program determine the program option or options and settings it would provide:
  - Center-based, home-based, combination, or family child care;
  - Locations for centers in the area to be served by home-based programs;
  - Hours of operation; and
  - Full-day or part-day services? 1305.3(d)(2), 1305.3(d)(5)
- How did the program determine the recruitment area that would be served by each delegate? 1305.3(d)(4)
- How did the program determine which services it would provide directly, through collaboration, and by referral (e.g., health services, mental health services, transportation services)?
- How does the program determine the its staffing it will use to support the program option or option(s) and settings it provides (e.g., staff skills and experience, the agency needs, staff composition necessary to reflect the languages, cultures, and heritage of community members of the community)?
- How often does the program analyze the Community Assessment data and make appropriate program changes to maximize its ability to meet community needs and understand community strengths?

**Program Design and Management Question 3C**

Does the program conduct an annual Self-Assessment of program effectiveness and progress in meeting local program goals and objectives and in implementing and complying with Federal requirements?

641A(g)(1), 641A(g)(2)(B)  
Link: PDM3F

**Targeted Questions for Program Design and Management Question 3C****Document Review: Governing Body Meeting Minutes**

- Do the governing body meeting minutes establish that the Self-Assessment results were shared with the governing body?

**Document Review: Self-Assessment**

- Summarize the areas out of compliance and strengths the grantee identified in its annual Self-Assessment. In your summary, indicate whether the agency developed and submitted an improvement plan to the Office of Head Start, approved by the agency's governing body, designed to strengthen weaknesses identified through its Self-Assessment. Include in your summary a description of whether the program has made corrections to address areas of out of compliance that it identified in its Self-Assessment. 641A(g)(2)(B)
- Does the Self-Assessment show evidence of involvement by governing body members? Does the Self-Assessment address financial management systems?
- Has the program used its Self-Assessment to determine program effectiveness in meeting its goals?
- Was the Self-Assessment conducted at least once each program year?
- Was the Self-Assessment conducted with the consultation and participation of Policy Councils, Policy Committees (as applicable), and other community members (as appropriate)?

**Interview: Governing Body Members, Head Start Director (Corrective Action)**

- In conducting the Self-Assessment, what actions are taken when instances of noncompliance with Federal requirements are discovered?
- How is the Self-Assessment conducted? How are you involved in the program's annual self-assessment of its effectiveness and of its progress in meeting local Head Start program goals and implementing Federal requirements?

**Program Design and Management Question 3D**

Does the program use the Community Assessment and Self-Assessment to formulate both long-range program goals and short-term program and financial objectives?

Note: The 2007 Head Start Act refers to the community assessment as a community-wide strategic planning and needs assessment.

1304.51(a)(1)(ii),  
641A(g)(2)(A)  
Link: PDM3F

**Targeted Questions for Program Design and Management Question 3D****Interview: Head Start Director (Planning--Goals)**

- Describe how the program develops its goals to respond to community needs.
- Describe how the program reviews and revises its goals to address the outcomes of the annual Self-Assessment. Can you share an example of changes to program goals based on the Self-Assessment?
- Describe how the program reviews and revises its goals to respond to changes in the community. How do you identify community-wide changes? Can you share an example of a change in the community that prompted a review?
- What are the agency-determined program goals for improving children's school readiness? How are the school readiness goals aligned with the Head Start Child Outcomes Framework, state early learning standards, as appropriate, and requirements and expectations of schools the children will be attending? [641A\(g\)\(2\)\(A\)](#)
- What are the long-range goals of the program?
- What are the short-term program and financial objectives that help the program to accomplish long-range program goals?



#### Program Design and Management Question 3E

Does the program's written plan include strategies for implementing its goals and objectives?

1304.51(a)(1)(iii)  
Link: PDM3F

#### Targeted Questions for Program Design and Management Question 3E

##### Document Review: Service Plans/Program Plans

- Write a summary describing the program's plans, including:
  - Program's overall long-range goals;
  - Specific short-term program and fiscal objectives and activities to be carried out;
  - Whether goals are linked to the Community Assessment (give up to 3 examples);
  - How and when specific activities are implemented and goals attained;
  - Who will assume responsibility for implementing each element of the plan; and
  - How individual activities will be evaluated.

##### Interview: Head Start Director (Planning--Goals)

- How are program plans communicated and shared with staff?
- How is the written program plan implemented?



**Program Design and Management Question 3F**

Has the program developed and implemented a systematic, ongoing process of program planning?

1304.51(a)(1)

**Targeted Questions for Program Design and Management Question 3F**

**Document Review: Summary Analysis**

- Based on your analysis of the Community Assessment (CQ PDM3C), Self-Assessment (CQ PDM3D), and written plan development processes (CQ PDM3E), how would you describe the program's overall process for program planning?
- Review the summaries from service area compliance questions ERSEA1D, FCS4B, FCS5A, MH2C, and SAF1H that reflect on the program's planning process. Describe whether the program's services implementation suggests that it has a systematic, ongoing program planning process.

**Program Design and Management Question 4A**

Has the program established and implemented procedures for ongoing monitoring of its Early Head Start (EHS) and Head Start (HS) operations at the grantee and delegate level?

1304.51(i)(2)

**Targeted Questions for Program Design and Management Question 4A****Document Review: Ongoing Monitoring Documents and Tools**

- Review ongoing monitoring tools or materials, if available. Can you share a summary of the program's process for the ongoing monitoring of its services and systems?

**Document Review: Summary Analysis**

- Review summaries from compliance questions ECD6A, ERSEA2A, FCS6A, HEA5A, MH3A, NUT5A, PDM4B, SAF4A, and TRANS5A to help you determine whether the program has established and implemented procedures for ongoing monitoring

**Interview: Governing Body Members (Ongoing Monitoring)**

- How does the governing body direct correction of instances of noncompliance identified by Federal, State, local, or Tribal authorities?

**Interview: Head Start Director (Ongoing Monitoring)**

- Describe the staff or consultants who play a role in ongoing monitoring of each service area.
- What types of measures, tools, materials, or procedures do you use to determine how effectively the program implements overall operations and continues to meet program goals and regulations? Can you show me the measures, tools, materials, or procedures you use?
- Who is accountable for corrective actions?

**Interview: Head Start Director (Self-Assessment)**

- How often do you receive ongoing status reports that capture the program's progress in meeting its goals and compliance? How do you use the information from these reports to improve program quality and make necessary corrections?



**Program Design and Management Question 4B**

APPLIES ONLY TO: Grantees with delegates

Does the program inform delegate governing bodies of deficiencies in delegate operations identified in the monitoring review and help them develop plans, including timetables, for addressing problems?

1304.51(i)(3)  
Link: PDM4A

**Targeted Questions for Program Design and Management Question 4B**

**Interview: Head Start Director (Ongoing Monitoring - Delegates)**

- Does the grantee inform delegate governing bodies promptly of deficiencies identified?
- Does the grantee work with delegates to set priorities and establish schedules for addressing areas of deficiency in delegate operations? Can you describe this process?

**Program Design and Management Question 5A**

Does the program have mechanisms for regular communication among all program staff to facilitate high-quality outcomes for children and families?

1304.51(e)

**Targeted Questions for Program Design and Management Question 5A****Document Review: Summary Analysis**

- Review summaries from compliance questions DIS2A, DIS2B, DIS2C, HEA3C, and NUT2A to help you determine whether the program has implemented mechanisms for regular communication among all program staff.

**Interview: Disabilities Staff, ECD Manager, ERSEA Staff, Facilities Staff, Family Child Care Provider, FCS Manager, FCS Staff, Financial Officer, Health Staff, Head Start Director, Home Visitor, Mental Health Staff/Consultant, Nutrition Staff, Teaching Staff, Teaching Staff-EHS, Transportation Manager, Transportation Staff (Staff Communications)**

- Are staff meetings scheduled regularly? How often do you participate in these meetings? Do you offer input and participate in discussions at these meetings? Can you describe the meetings, in general?
- Are there geographical or other constraints that prevent your full participation or regular communication with other staff? If so, how do you overcome these constraints? What part does technology play in facilitating communication among staff?
- How are you made aware of policy or operational changes?
- What steps are followed to ensure regular communication among program staff?

**Interview: Head Start Director (Staff Communications)**

- Describe a recent instance during which communication across staff was necessary to ensure high-quality services and outcomes for children. Was communicating across staff easy? What made it work or not work?
- What process do you follow to share information regarding the care or education of enrolled children and their families?





**Program Design and Management Question 5B**

Is effective two-way communication between staff and parents carried out regularly throughout the Head Start program year?

1304.51(c)(1), 1304.51(c)(2),  
1304.20(e)(2)

**Targeted Questions for Program Design and Management Question 5B**

**Document Review: Summary Analysis**

- Review summaries from service area compliance questions DIS5A, DIS5B, FCS2B, FCS2C, HEA3C, HEA4C, MH2A, NUT2D, and NUT2F to determine whether the program carries out effective two-way communication between staff and parents throughout the program year.

**Interview: FCS Staff, Health Staff (Parent Communication)**

- Does the program familiarize parents with the use of and rationale behind health and developmental procedures administered through the program or by contract and obtain advance authorization for such procedures? 1304.20(e)(2)



#### Program Design and Management Question 6A

Does the program establish and maintain a record-keeping system that provides accurate and timely information regarding children, families, and staff and ensure appropriate confidentiality of this information?

1304.51(g)

#### Targeted Questions for Program Design and Management Question 6A

##### Document Review: Summary Analysis

- Review summaries from compliance questions ERSEA1B, ERSEA1G, FCS3B, HEA2A, HEA2E, HEA2F, PDM7C, PDM7E, and PDM7F to determine whether the program's record-keeping system provides accurate and timeline information, and maintains confidentiality where appropriate.

##### Interview: Head Start Director (Record-Keeping)

- How are security and confidentiality of child, family, and staff files maintained?
- How do you know if records are timely, up-to-date, and accurate?



**Program Design and Management Question 6B**

Are periodic reports of financial status and program operations provided to program governing bodies, policy groups, and staff to advise them and to control program quality and maintain program accountability?

1304.51(h)(1)

**Targeted Questions for Program Design and Management Question 6B**

**Document Review: Summary Analysis**

- Review summaries from compliance questions ERSEA1F, FIS5A, FIS5B, FIS5C, PDM1C, and PDM2E to help you determine whether the program follows effective reporting practices.



**Program Design and Management Question 6C**

Does the program publish and make available to the public an annual report?

Note: This compliance question will be addressed in monitoring reviews conducted after January 1, 2009.

644(a)(2)

**Targeted Questions for Program Design and Management Question 6C**

**Document Review: Annual Report to the Public**

- Does the report include the following elements:
- Total amount of public and private funds received and the amount from each source;
  - Explanation of budgetary expenditures and proposed budget for the fiscal year;
  - Total number of children and families served, average monthly enrollment (as a percentage of funded enrollment), and percentage of eligible children served;
  - Results of the most recent review by the Secretary and the financial audit;
  - Percentage of enrolled children who received medical and dental exams;
  - Information about parent involvement activities;
  - Agency's efforts to prepare children for kindergarten; and
  - Other information required by the Secretary.

**Interview: Head Start Director (Reporting)**

- When do you publish an annual report available to the public? How is the report made available to the public (your community)?

**Program Design and Management Question 7A**

Does the program's organizational structure support the accomplishment of program objectives? Does the structure address the major functions and responsibilities assigned to each staff position and provide adequate mechanisms for staff supervision and support?

1304.52(a)(1), 1306.20(b),  
1304.52(a)(2)

**Targeted Questions for Program Design and Management Question 7A**
**Document Review: Organizational Chart**

- Does the organizational chart reflect assignments of applicable management function? Are the program's defined management functions able to adequately support the program's goals?
- Does the organizational structure provide for a separation of executive responsibilities from fiscal management? Do fiscal staff have potentially conflicting roles in managing operations outside the fiscal area? Does the organizational chart for the fiscal area reveal potential weaknesses in segregation of duties?

**Interview: Disabilities Staff, ECD Manager, ERSEA Staff, Facilities Staff, Family Child Care Provider, FCS Manager, FCS Staff, Financial Officer, Health Staff, Head Start Director, Home Visitor, Mental Health Staff/Consultant, Nutrition Staff, Teaching Staff, Teaching Staff-EHS, Transportation Manager (Staffing)**

- Does the supervision and support process include feedback designed to improve the quality of services? How do you track improvement or continuing need for corrective action?
- What is your process for providing supervision and support to staff?

**Interview: Disabilities Staff, ECD Manager, ERSEA Staff, Facilities Staff, Family Child Care Provider, FCS Manager, FCS Staff, Financial Officer, Health Staff, Head Start Director, Home Visitor, Mental Health Staff/Consultant, Nutrition Staff, Teaching Staff, Teaching Staff-EHS, Transportation Manager, Transportation Staff Interview (Staffing)**

- Do you feel that clear lines of communication and supervision exist to support you in fulfilling your role and responsibilities? How do staff convey their need for support? How are these requests handled?

**Interview: ECD Manager (Staffing)**

- Does supervision include direct observation of teaching? If so, what is observed? How often are observations conducted? What tools are used to conduct assessments?
- How does the child development specialist periodically verify compliance with contract requirements or agency policies?
- How frequently are family child care homes visited by a child development specialist? Are visits announced?

**Interview: FCS Staff (Staffing)**

- Do you have the opportunity to talk with your supervisor and reflect critically on your work with individual families?

**Interview: Head Start Director (Organizational Structure)**

- Can you describe the mechanisms for staff supervision and support? Are they adequate?
- How does the program's organizational structure support the accomplishment of program objectives? 1304.52(a)(1)
- What staff person within the program is formally assigned to and has adopted management of each of the following:
  - Program management (Head Start Director or Early Head Start Director);



**Targeted Questions for Program Design and Management Question 7A**

- Child development and education;
- Child medical and dental;
- Child mental health;
- Child nutrition;
- Services for children with disabilities; and
- Management of family and community partnerships, including parent activities?



**Program Design and Management Question 7B**

Has the program hired staff or consultants who meet the required qualifications to provide content area expertise and oversight on an ongoing or regularly scheduled basis?

1304.52(d)

**Targeted Questions for Program Design and Management Question 7B**

**Document Review: Summary Analysis**

➤ Based on your review of the evidence collected for compliance questions below, has the program hired staff or consultants who meet the required qualifications to provide content area expertise and oversight on an ongoing or regularly scheduled basis?

- ECD1A, ECD1B, ECD1C
- FCS1A, FCS1B
- MH1A
- DIS1A
- NUT1A
- HEA1A
- FIS1E



#### Program Design and Management Question 7C

Does the program conduct annual performance reviews of all staff?

1304.52(j)  
Link: PDM6A

#### Targeted Questions for Program Design and Management Question 7C

##### Document Review: Staff Files

- Indicate the date of the most recent performance review and the overall rating given. [1304.52\(i\)](#)

**Interview: Disabilities Staff, ECD Manager, ERSEA Staff, Facilities Staff, Family Child Care Provider, FCS Manager, FCS Staff, Financial Officer, Health Staff, Head Start Director, Home Visitor, Mental Health Staff/Consultant, Nutrition Staff, Teaching Staff, Teaching Staff-EHS, Transportation Manager (Human Resources)**

- Did you receive an annual performance review?
- How are the results of the annual performance review used? Do they help you identify your training and professional development needs? How does your manager help you improve skills and professional competencies?

##### Interview: Head Start Director (Policies and Procedures)

- Describe the annual performance review process and elements of performance evaluated.

##### Interview: Transportation Staff (Human Resources)

- Do you receive an annual evaluation that includes an onboard observation? When was your last evaluation?





**Program Design and Management Question 7D**

APPLIES ONLY TO: Fulltime employees

Does the program ensure that all full-time Education and Early Childhood Development Head Start employees who provide direct services to children have a professional development plan that is evaluated regularly to assess its impact on teacher and staff effectiveness?

648A(f)

**Targeted Questions for Program Design and Management Question 7D**

**Document Review: Staff Files**

- Indicate the date of the staff professional development plan and up to three goals identified in the plan. 648A(f)

**Interview: Head Start Director (Human Resources)**

- Can you describe the process for designing and implementing professional development plans for all fulltime staff who provide direct services to children?

**Interview: Interview: Family Child Care Provider, Home Visitor, Teaching Staff, Teaching Staff-EHS, Disabilities (Human Resources)**

- Do you have a professional development plan? Did you participate in the plan's development? Is it evaluated regularly?

**Program Design and Management Question 7E**

Does the program obtain:

- Federal, State, or tribal criminal record check covering all jurisdictions where the grantee provides Head Start services to children;
- Federal, State, or tribal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services; or
- Criminal record check as otherwise required by Federal law?

Note: The Head Start Act, enacted December 12, 2007, requires that background checks must be completed on all employees before they are hired. Accordingly, the following guidelines apply for reviewing the completion of background checks:

- For employees hired before December 12, 2007: The program is required to conduct the background check before an employee is made permanent, in accordance with 1301.31(b)(1)(iii).
- For employees hired on or after December 12, 2007: The program is required to conduct a background check before all staff are hired, in accordance with 648(g)(3).

648A(g)(3)(A), 648A(g)(3)(B),  
648A(g)(3)(C), 1310.16(b),  
1301.31(b)(1)(iii)  
Link: PDM6A

**Targeted Questions for Program Design and Management Question 7E****Document Review: Staff Files**

- Confirm background checks for staff via the program's tracking system. Select staff files to verify the staff background check information provided in the tracking system. If a tracking system is unavailable, review staff files for each service area to determine whether appropriate criminal record checks are conducted before hire date.

For all staff, indicate the date the background check was conducted. 648A(g)(3)(A), 648A(g)(3)(B), 648A(g)(3)(C), 1310.16(b)

**Interview: Head Start Director (Human Resources)**

- What is the process for obtaining the appropriate criminal record checks before hiring an employee?

**Program Design and Management Question 7F**

Does the program have documentation on each staff member's initial health examination (including screening for tuberculosis) and periodic reexaminations (as recommended by his or her health care provider or as mandated by State, local, or Tribal laws)?

1304.52(k)(1)  
Link: PDM6A

**Targeted Questions for Program Design and Management Question 7F****Document Review: Staff Files**

- Review staff files for documentation of initial health examination (including screening for tuberculosis) and reexamination (if required by health care provider or as mandated by State, local or Tribal laws). Indicate the date of the most recent health screen.

**Document Review: Summary Analysis**

- Review summaries from staff file reviews conducted by the review team to determine whether if initial health exams and periodic reexaminations are conducted for each staff member.

In your documentation and notes, indicate whether periodic reexaminations are mandated by the State, local, or Tribal laws, and, if so, whether reexaminations are documented on schedule. Also note the number of files that:

- Were reviewed for initial health exams;
- Lacked documentation of initial health exams; and
- Lacked verification of tuberculosis screening.

**Interview: Head Start Director (Human Resources)**

- How do you ensure that each staff has an initial health exam, including screening for tuberculosis, and periodic reexaminations?



**Program Design and Management Question 7G**

Is the Head Start Director or Early Head Start Director qualified for the position through having demonstrated skills and abilities relevant to human services program management?

1304.52(c)

**Targeted Questions for Program Design and Management Question 7G**

**Document Review: Staff Files**

- List the degree or degrees, training, experience, and qualifications documented in the personnel file or resume of the Early Head Start Director or Head Start Director. Does the Head Start Director or Early Head Start Director have the qualifications needed for the position?

**Interview: Head Start Director (Organizational Structure)**

- What kind of work experience did you have before being hired here?



**Program Design and Management Question 7H**

Does the program ensure that all staff abide by established standards of conduct and address violations of these standards?

1304.52(i)(1), 1304.52(i)(1)(i),  
1304.52(i)(1)(ii),  
1304.52(i)(1)(iii),  
1304.52(i)(1)(iv)

**Targeted Questions for Program Design and Management Question 7H**

**Document Review: Policies and Procedures**

- Do the standards of conduct include all elements specified in 1304.52(i)(1)(i); 1304.52(i)(1)(ii); 1304.52(i)(1)(iii); and 1304.52(i)(1)(iv)?

**Interview: Head Start Director (Human Resources)**

- Has the program established standards of conduct and addressed violations of these standards?

**Interview: Teaching Staff (Meal Service)**

- How do you encourage children to try new foods? Do children have to eat all of the foods offered? Are there times when children are not allowed to have something that is offered or are given something extra because of behavior?

**Observation: Meal Service/Code of Conduct**

- How are children encouraged to try new foods? Do children have to eat all of the foods offered? Are there times when children are not allowed to have something that is offered or are given something extra because of behavior?

**Program Design and Management Question 71**

Does the program provide opportunities for ongoing training and development for all staff?

1304.52(l)(2), 1304.52(l)(3)

**Targeted Questions for Program Design and Management Question 71****Document Review: Staff Files**

- Review staff files for evidence of training opportunities for staff and volunteers to help them acquire or increase the knowledge and skills necessary to fulfill their job responsibilities in the service area and to implement the Head Start Program Performance Standards in the service area. List the dates and types of training staff have received.

**Interview: Disabilities Staff, ECD Manager, ERSEA Staff, Facilities Staff, Family Child Care Provider, FCS Manager, FCS Staff, Financial Officer, Health Staff, Head Start Director, Home Visitor, Mental Health Staff/Consultant, Nutrition Staff, Teaching Staff, Teaching Staff-EHS, Transportation Manager (Training)**

- Does the program provide opportunities for ongoing training to help you acquire and maintain the skills and knowledge necessary to fulfill your job responsibilities and to implement Head Start Program Performance Standards in the service area? Can you describe the training opportunities available to you?

**Interview: ECD Manager (Training)**

- How does the program offer family child care providers opportunities for training in the following areas:
  - Infant, toddler, and preschool development;
  - Curriculum implementation;
  - Skills for working with children with disabilities;
  - Effective communication with children and their families;
  - Safety, sanitation, hygiene, health practices, and certification in infant and child CPR;
  - USDA and Child and Adult Care Food Program regulations; and
  - Other skills necessary to increase their knowledge of children and family services?
- What training opportunities have been available over the past year? How do you determine what kind of training individual teachers need?

**Interview: Head Start Director (Training)**

- Describe the program's approach and plans for providing ongoing training and development opportunities for all staff.

**Interview: Teaching Staff (Training)**

- How have you been trained to use the current curriculum? What type of training have you received on planning and maintaining positive environments for children? Describe the training you have received on engaging in positive interactions with children.

**Program Design and Management Question 7J**

Has the program established staff training that includes methods that comply with applicable State and local laws for identifying and reporting child abuse and neglect?

1304.52(l)(3)(i)

**Targeted Questions for Program Design and Management Question 7J****Document Review: Policies and Procedures**

- Does the program address applicable State, local, or Tribal laws for identifying and reporting child abuse and neglect in its training plans and policies?
- Review the programs policies and procedures, including training plans and policies.  
Does the program's approach to staff training and development on identifying and reporting child abuse and neglect take a helpful, rather than punitive, attitude toward abusing or neglectful parents and other caretakers, as appropriate?

**Document Review: Staff Files**

- Indicate the date staff received training in identifying and reporting child abuse and neglect.

**Interview: Head Start Director (Training)**

- Does the program's approach to staff training and development on identifying and reporting child abuse and neglect take a helpful, rather than punitive, attitude toward abusing or neglectful parents and other caretakers, as appropriate?

**Interview: Interview: Disabilities Staff, ECD Manager, ERSEA Staff, Facilities Staff, Family Child Care Provider, FCS Manager, FCS Staff, Health Staff, Head Start Director, Home Visitor, Mental Health Staff/Consultant, Nutrition Staff, Teaching Staff, Teaching Staff-EHS, Transportation Manager, Transportation Staff (Training)**

- When did you receive training on identifying and reporting child abuse and neglect? What steps would you take if you suspected child abuse or neglect?



**Program Design and Management Question 7K**

Does each Head Start teacher attend at least 15 hours of classroom-focused professional development each year?

648A(a)(5)

**Targeted Questions for Program Design and Management Question 7K**

**Document Review: Staff Files**

- Describe the training provided to teachers. Does it include at least 15 hours of classroom-focused professional development each year?

**Interview: ECD Manager (Human Resources)**

- How do you evaluate training opportunities to ensure a positive and lasting impact on classroom instruction and teacher performance? 648A(a)(5)
- How does the program ensure that each Head Start teacher attends at least 15 hours of classroom-focused professional development each year?





**Program Design and Management Question 8A**

Describe strengths of the grantee.

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**Targeted Questions for Program Design and Management Question 8A**

**Document Review: Summary Analysis**

- During the Wednesday team meeting, collaborate with all reviewers to identify grantee strengths document their responses. Do not include strengths that will contradict any PANCs identified on this review. All strengths will be evaluated by the Office of Head Start.

**Interview: Head Start Director (Program Strengths)**

- Describe your programs' strengths.



## Eligibility, Recruitment, Selection, Enrollment, and Attendance

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Question for parents, regardless of where it resides in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Eligibility, Recruitment, Selection, Enrollment, and Attendance section of the Protocol is divided into two subsections:

*Section 1: Eligibility, Recruitment, Selection, Enrollment, and Attendance*

*Section 2: Ongoing Monitoring*

**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1A**

APPLIES ONLY TO: Programs serving preschool-age children

Based on the results of the Age/Income Eligibility Review, does the Head Start program serve only children who are at least 3 years old by the date used to determine eligibility for public school in the community in which the program is located, except in cases where the program's approved grant provides specific authority to serve younger children?

Note: For all Head Start programs, if a vacancy opens during the program year, it may be filled by a 3-year-old who is otherwise eligible. Children in Migrant and Seasonal programs are eligible from birth to the child's entry into kindergarten.

1305.4(a)

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1A****Document Review: Age/Income Eligibility Review Form**

- Refer to the results summarized from the Age/Income Eligibility Review. In your notes, include the number of files reviewed and indicate the number and percentage of children the Head Start program serves who are not at least 3 years old by the date used to determine eligibility for public school in the community with the program is located.



#### Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1B

Do program staff verify each child's eligibility and include in each file a statement signed by a program employee identifying the child's eligibility category and documents examined to determine eligibility?

Note: Signed statements may list one of the following acceptable forms of proof of eligibility: Individual Income Tax Form 1040, W-2 forms, paystubs, pay envelopes, employers' written statements, documentation showing current status as recipients of public assistance, and declarations of zero income. Also, note that homeless children and foster children are categorically eligible.

1305.4(c), 1305.4(d),  
1305.4(e)  
Link: PDM6A

#### Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1B

##### Document Review: Age/Income Eligibility Review Form

- Refer to the results summarized from the Age/Income Eligibility Review. In your notes, include the number and percentage of files reviewed that do not have signed statements identifying the child's eligibility category and documents examined to determine eligibility.

**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1C**

If the program has enrolled children who do not meet one of the criteria below, does more than 45 percent of the program's enrollment consist of children whose family income is above poverty, with (a) no more than 10 percent being any income level and (b) up to an additional 35 percent of the children's family income falling between 100 percent and 130 percent of poverty?

- The child's family income is below the poverty line.
- The child's family is receiving public assistance.
- The child's family is homeless.
- The child is a foster child.

645(a)(1)(B)(iii)(II)

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1C****Document Review: Age/Income Eligibility Review Form**

- Refer to the results summarized from the Age/Income Eligibility Review. Review information, and indicate the number and percentage of children that the program has determined to be in the categories of "income or categorically eligible" and "income or categorically ineligible." If fewer than 55 percent of the children enrolled are income or categorically eligible, the program might be out of compliance. In addition, if more than 10 percent of the children are income or categorically ineligible, the program might be out of compliance.

**Interview: ERSEA Staff (Enrollment & Recruitment)**

- What percentage of children falls into each of the following categories?
  - The child's family income is below the poverty line.
  - The child's family is receiving public assistance.
  - The child's family is homeless.
  - The child is a foster child.

**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1D**

APPLIES ONLY TO: Programs serving children whose family income falls between 100 percent and 130 percent of poverty

If the agency serves children whose family income falls between 100 percent and 130 percent of poverty, has it established and implemented outreach and enrollment policies and procedures to first ensure it is meeting the needs of children who meet one of the following criteria?

- The child's family income is below the poverty line.
- The child's family is receiving public assistance.
- The child's family is homeless.
- The child is a foster child.

645(a)(1)(B)(iii)(II)(aa),  
645(a)(1)(B)(iii)(II)(bb)  
Link: PDM3F

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1D****Document Review: Policies and Procedures**

- Review available documentation of outreach and enrollment policies and procedures to determine whether outreach is occurring before enrolling children between 100 percent and -130 percent of poverty.
- Review documentation of the program's process used to determine whether the program's decision to enroll children between 100 percent and 130 percent of poverty meets the needs of the area that the program serves. Describe this process.

**Interview: ERSEA Staff (Enrollment & Recruitment)**

- Describe the steps you take to ensure the program is meeting the needs of children below the poverty line, children between 100 percent to -130 percent of poverty, children eligible for public assistance, foster children, or homeless children before enrolling other children.
- How do you enroll waitlisted children?

**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1E**

APPLIES ONLY TO: American Indian or Alaska Native grantees enrolling more than 10 percent of over-income children

Do American Indian or Alaska Native grantees that enroll more than 10 percent of over-income children meet the requirements in 1305.4(b)(3)(i) and 1305.4(b)(3)(ii)?

Note: Although American Indian and Alaska Native grantees may enroll up to 49 percent over-income children, they must meet certain conditions, including:

- Serving all income-eligible children living on the reservation;
- Serving all income-eligible children native to the reservation but living in non-reservation areas; and
- Enrolling all non-American Indian income-eligible children whose families wish to enroll if the non-reservation area is not served by another Head Start (HS) program.

1305.4(b)(3)(i),  
1305.4(b)(3)(ii),  
1305.4(b)(3)(iv)

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1E****Document Review: Age/Income Eligibility Review Form**

- Review documents to confirm that the total enrollment of income-eligible children is at least 51 percent if the tribe meets the conditions in 1305.4(b)(3)(i) and 1305.4(b)(3)(ii)? 1305.4(b)(3)(iv)

**Document Review: Policies and Procedures**

- Review available documentation of the process for enrolling over-income Native children. Describe this process.

**Interview: ERSEA Staff (Income-eligibility)**

- Can you walk me through the process you follow to check that all income-eligible Native children living in non-reservation areas but within the tribe's approved service area, who wish to enroll in the program, are accepted before more than 10 percent over-income children are accepted? 1305.4(b)(3)(ii)
- Can you walk me through the process you follow to check that you have served all income-eligible children living on the reservation who wish to enroll before accepting more than 10 percent over-income children? 1305.4(b)(3)(i)
- Has the tribe enrolled all non-American Indian income-eligible children whose families wish to enroll, if the non-reservation area is not served by another Head Start program, before accepting more than 10 percent over-income children? 1305.4(b)(3)(ii)



**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1F**

Does the program have documentation to support monthly enrollment data submitted to the Office of Head Start (OHS)?

Note: Effective September 18, 2008, grantees are required to submit monthly enrollment data.

641A(h)(2)(A), 641A(h)(2)(B)  
Link: PDM6B

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1F**

**Document Review: Enrollment Reports**

- Review enrollment reports. Describe how actual enrollment data align with the data submitted in monthly enrollment reports.





#### Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1G

APPLIES ONLY TO: Center-based programs

When monthly average daily attendance in center-based programs falls below 85 percent, are the causes of absenteeism analyzed?

1305.8(a)  
Link: PDM6A

#### Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1G

##### Document Review: Attendance Records

- Review daily attendance records to determine whether causes of absenteeism are documented.

##### Interview: ERSEA Staff (Attendance)

- After conducting the absenteeism analysis, what do you do with the information? How is that information used to resolve absenteeism problems (if they exist)?
- Can you describe factors considered in analyzing absenteeism and from where the information comes? Does the analysis look at the patterns of absences for each child, including the reasons for absences, and number of absences that occur on consecutive days?
- How do you document daily attendance? Can you show me how you track attendance and how you know whether attendance falls below 85 percent?



**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1H**

Has the program ensured that no child's enrollment or participation in the Head Start program is contingent on payment of a fee?

Note: Requiring parents to provide diapers should be cited under the Program Design and Management Section of the protocol.

1305.9

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1H**

**Interview: Parent (Fees)**

- Have you ever been required to pay Head Start in exchange for your child's participation in the program?



#### Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1I

APPLIES ONLY TO: Programs serving preschool-age children

Does the program conduct outreach and recruitment activities to actively locate and recruit preschool-age children with disabilities?

Note: Grantees will have the first quarter (October to December) to meet this requirement. If the review occurs before January 2009, look at the previous year's data to determine a possible area of concern.

1308.5(a)

#### Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1I

##### Document Review: Recruitment Materials

- Describe information about serving children with disabilities, including children with severe disabilities.

##### Interview: ERSEA Staff (Enrollment & Recruitment)

- Does the program reach out to other agencies serving children with disabilities? If so, which agencies? How does the program reach out to these agencies?
- Has outreach resulted in referrals and acceptance of children with disabilities?



**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1J**

DOES NOT APPLY TO: Programs with a waiver approved by the Administration for Children and Families (ACF) for this requirement

Does enrollment include at least 10 percent children with disabilities?

Note: This compliance question will be addressed in monitoring reviews conducted after January 1, 2009.

640(d)(1)

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1J**

**Interview: ERSEA Staff (Enrollment & Recruitment)**

- Does the enrollment figure include 10 percent children with disabilities? If the enrollment figure reflects fewer than 10 percent children with disabilities, does the grantee have a waiver?

**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1K**

APPLIES ONLY TO: Programs serving children whose family income falls between 100 percent and 130 percent of poverty

Does the program report to OHS annually on enrollment by eligibility category?

Note: This compliance question will be addressed in monitoring reviews conducted in FY2010; it will not be addressed on reviews conducted in FY2009.

645(a)(1)(B)(iv),  
645(a)(1)(B)(iv)(I),  
645(a)(1)(B)(iv)(II),  
645(a)(1)(B)(iv)(III),  
645(a)(1)(B)(iv)(IV),  
645(a)(1)(B)(iv)(V),  
645(a)(1)(B)(iv)(VI),  
645(a)(1)(B)(iv)(VII)  
Link: PDM6B

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1K****Document Review: Enrollment Reports**

- Does the report address how the program is meeting the needs of children from families receiving public assistance in the area served? Does it include local demographic data on families living below poverty or on homeless families? 645(a)(1)(B)(iv)(I)
- Does the report address the outreach and enrollment policies and procedures established by the agency to ensure the agency is meeting the needs of children eligible for services due to poverty, homelessness, or disability, before meeting the needs of children at 100 percent to -130 percent of poverty? 645(a)(1)(B)(iv)(II)
- Does the report describe the program's efforts to be fully enrolled with children who live below the poverty line or who are homeless? 645(a)(1)(B)(iv)(III)
- Does the report describe the program's policies, procedures, and selection criteria implemented to serve eligible children? 645(a)(1)(B)(iv)(IV)
- Does the report detail the eligibility criteria category of the children on the agency's waiting list? 645(a)(1)(B)(iv)(VII)
- Does the report provide information on the number of children served by the agency, disaggregated by whether such children are eligible under clause (i), clause (II), clause (iii)(I), or clause (iii)(II)? 645(a)(1)(B)(iv)(VI)
- What did the agency report as the enrollment level in the most recent report? What was enrollment for the prior fiscal year? 645(a)(1)(B)(iv)(V)

**Interview: ERSEA Staff (Enrollment & Recruitment)**

- Describe the steps you take to ensure the program is meeting the needs of children below the poverty line, children between 100 percent to -130 percent of poverty, children eligible for public assistance, foster children, or homeless children before enrolling other children.

**Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1L**

Does the program operate one or more of the approved program options in accordance with applicable regulations?

1306.33(a)(1), 1306.33(a)(2),  
1306.35, 1306.31(a),  
1306.34(a)(2), 1306.32(b)(3)

**Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1L****Document Review: Service Plans/Program Plans**

- If the grantee operates double session, are classes in operation for no more than 4 days per week?
- If the program operates a center-based program, how does it ensure it provides the required number of hours or days of operation? [1306.32\(b\)\(3\)](#)
- If the program operates a combination option, does it provide an acceptable combination of minimum number of class sessions and home visits over a period of 8 months to 12 months? [1306.34\(a\)\(2\)](#)
- If the program operates a home-based option for Early Head Start, does it provide the required minimum weekly home visits and monthly group socializations for the number of weeks of operation as approved in the grant? [1306.33\(a\)\(1\)](#), [1306.33\(a\)\(2\)](#)
- If the program operates a home-based option, does it provide 1 home visit per week per family (a minimum of 32 home visits per year), lasting a minimum of 1½ hours each, as well as provide 2 group socialization activities per month for each child (a minimum of 16 group socialization activities per year)? [1306.33\(a\)\(1\)](#), [1306.33\(a\)\(2\)](#)
- If the program operates an alternate program variation, can it demonstrate ACF approval? [1306.35](#)



#### Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 2A

Can the program demonstrate that it has established and implemented procedures for ongoing monitoring of eligibility, recruitment, selection, enrollment, and attendance practices at the grantee and delegate level to ensure effective implementation of Federal regulations?

1304.51(i)(2)  
Link: PDM4A

#### Targeted Questions for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 2A

##### Interview: ERSEA Staff (Ongoing Monitoring)

- How do you monitor the program's eligibility, recruitment, selection, enrollment, and attendance practices and the program's compliance with all Federal regulations?
- What do you do if you detect problems or weaknesses with the program's eligibility, recruitment, selection, enrollment, and attendance practices? What is the process for reporting and documenting problems identified with ERSEA? Who reports such information and to whom is it reported? How and where is it documented, if at all?